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REQUEST FOR INFORMATION AND COMMENTS ON THE APPLICATION, AND NOTIFICATION OF THE SECRETARY OF STATE'S DECISION TO SET A NEW DATE FOR DETERMINATION OF THE APPLICATION - EN010007

Item 36 . Welsh Planning Policy & Climate Emergency Declaration

We applaud the Welsh Government for taking the initiative and declaring a Climate Change Emergency on April 29th 2019. Climate change is the most important issue facing us today and we contend that Wylfa Newydd is a costly distraction and does not fit with current Welsh Government policy on developing low carbon energy to address climate change. Wales needs to find green, renewable and sustainable ways of cutting emissions and NOT allow the UK Government to substitute one environmental disaster for another in Wales.

The IPCC Report on climate change also attacks the notion that nuclear power is a key climate change solution " ... " as it risks nuclear proliferation, may cause childhood leukaemia and destroys the natural environment "

https://report.ipcc.ch/sr15/pdf/sr15_chapter5.pdf

Our contention is that Wylfa Newydd has no place in a climate emergency scenario for the following reasons

1. The Wylfa Newydd proposal is at variance with Welsh Government Policy
2. Nuclear power is not low carbon.
3. Wylfa is a costly distraction to meeting our climate change targets
4. Concerns exist about the Wylfa site on Ynys Mon in relation to climate change

1. WYLFA NEWYDD AT VARIANCE WITH WELSH GOVERNMENT POLICY

Proposed new developments at Wylfa, in our view, are at variance with a number of Welsh Government policies and initiatives, some of which have emerged since the Public Inquiry started. Notably the Welsh Government has declared a Climate Change Emergency and has outlined measures to tackle this in Wales.

Climate change is the most important issue facing us today and the Welsh Government is taking steps to address this. However, there are a number of issues where there is a mismatch between Welsh Government legislation and policy and the UK Governments' intentions for new nuclear power stations in Wales.

1.1 DEVOLUTION

In relation to Welsh Government - energy policy has not been totally devolved with large nuclear developments (such as Wylfa) still the remit of UK Government. However, things have recently altered. In April 2019 the Welsh Government received greater permitting and consenting powers which are expected to a) allow Wales to exercise more influence over levels of emissions and b) expand Welsh Ministers' decision-making remit from 50MW onshore to 350MW (on and off shore for the power sector). These extended powers are being implemented in phases .

As more powers are being devolved to the Welsh Government Wales could follow the lead of the Scottish Government, which has turned its back on nuclear, and is moving ahead with ambitious targets to cut emissions by developing renewable technologies . Scotland has stated its ..." *continued opposition to new nuclear stations under current technologies.* " ...<https://www.gov.scot/publications/scottish-energy-strategy-future-energy-scotland-9781788515276/>

There is now substantial evidence that Wales can become 100% self –sufficient in energy without any input from nuclear. (see Section 3)

1.2 “WELLBEING OF FUTURE GENERATIONS ACT (WALES) 2015”

This flagship legislation offers a huge opportunity to make long-lasting, positive changes for future generations around clean energy. However, any new nuclear developments in Wales (or elsewhere) will increase our legacy of radioactive waste that future generations will have to manage.

In January 2019 the Welsh Government released its summary of responses on the consultation on “ Geological Disposal of Radioactive Waste - Working with Communities” . As a result 86 county, city, town and community councils in Wales have passed motions declaring their total objection to nuclear waste disposal in their communities despite financial bribes. It is immoral to go ahead and produce more radioactive waste when we are unable and unwilling to take responsibility for what we already have .

The Future Generations Commissioner for Wales has produced a “Ten Point Plan to Fund Wales Climate Emergency” - (White Paper - June 2019) , this document highlights Point 10 below for investment

....“ *Ensure decarbonisation is a key principle and driver for decision making within planning, public sector procurement contracts and pension fund investments supported by a programme to train a Carbon Literate public sector.* ”....

https://futuregenerations.wales/resources_posts/10-point-plan-to-fund-wales-climate-emergency/

WANA contends that nuclear power has no part to play in any decarbonisation programme in Wales as it is not low carbon, and just substitutes one environmental disaster for another with adverse long –term consequences for health and well-being.

1.3 PLANNING POLICY WALES

It is envisaged that Planning Policy Wales (PPW), which was launched in December 2018, will underpin all future planning decisions onshore.....

.....” ***PPW will help to ensure that the planning decisions taken in Wales, no matter how big, or how small, are going to improve the lives of both our current and future generations. It will support changing the way we live and work, and the buildings and environment of Wales, today, building a better environment to accommodate current and future needs.”***

.....” ***Planning applications for Developments of National Significance (DNS) are made directly to the Welsh Ministers. Categories of DNS and their associated thresholds are published by the Welsh Ministers and there is detailed guidance which supplements the determination process.***

It puts an emphasis on people and places and will ensure developments built today leave a legacy of well-designed, sustainable places that improve lives. Planning is a key lever for Wales in determining the sources of fuel for power generation.

<https://gov.wales/planning-policy-wales>

Planning Policy Wales (PPW) outlines the following in relation to climate change ...”***Climate change - The challenges include flooding and coastal change risks to communities, businesses and infrastructure; risks to health, wellbeing and productivity from high temperatures; risk of water shortages in the public water supply, agriculture, energy generation and industry and risks to soil, biodiversity and terrestrial, coastal, marine and freshwater habitats. Climate change is also likely to have significant impacts on landscape character, historic buildings, local distinctiveness and quality, directly through changing land cover, migrating habitat and species ranges, and indirectly by influencing land”***

<https://gov.wales/planning-policy-wales>

On Thursday December 13, 2018, the Welsh Government called in the planning application by Horizon Nuclear Power for preparation and clearance of the proposed Wylfa Newydd site to be considered in a full public local planning enquiry. WANA contends that it is the Welsh Government’s devolved right to hold an enquiry on the Application for Wylfa Newydd before any final decisions are made.

The National Development Framework (NDF) will also ensure the planning system in Wales plays a key role in facilitating clean growth and decarbonisation, and helps build resilience to the impacts of climate change. However, several documents regarding the proposed NDF are out for consultation and not due for consideration until after April 2020.

1.4 SECTION 6 DUTY – ENVIRONMENT OF WALES ACT 2016 (BIODIVERSITY AND RESILIENCE OF ECOSYSTEMS DUTY)

Part 1 of the Environment Wales Act 2016 outlines the Section 6 Duty which introduced an enhanced biodiversity and resilience of ecosystems duty for public authorities in the exercise of functions in relation to Wales. The S6 duty requires that public authorities must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems. <http://www.legislation.gov.uk/anaw/2016/3/contents/enacted>

Diversity is a key theme of the Act. It is about ensuring mechanisms are in place to minimise further loss and where circumstances allow for species' populations to expand and recolonise their natural range or adapt to future change. More diverse ecosystems are more resilient to external influences. This means development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit. However, substantial evidence was provided by non-governmental organisations in North Wales at the Wylfa Planning Inquiry about the effect of such a huge nuclear development on the nature reserves and SSI's on Ynys Mon. We believe that upwards of 750 acres of such land will be destroyed.

2. WYLFA NEWYDD IS NOT LOW CARBON

Part of the rationale we understand, for building Wylfa Newydd is to address climate change by providing a low carbon alternative to fossil fuels. However, nuclear energy is not the answer to climate change, it's not low carbon and it's too little too late.

The nuclear fuel cycle is a filthy, dangerous and unhealthy process leaving a legacy of radioactive wastes at all stages; from fuel production to decommissioning. Uranium the vital fuel component for nuclear reactors is a finite resource and is imported from countries such as Kazakhstan and Niger and its production is energy intensive. This fuel travels an average distance of 2,500 + miles before it reaches us.

It is only the operational side that is relatively low carbon. Greenhouse gases are emitted at all stages of the nuclear cycle: fuel production, construction (massive amounts of concrete used in construction) operation, dismantling and waste disposal. Leaving out any of these stages biases estimates towards lower values. The last two, dismantling and waste disposal are particularly difficult to estimate as no long-term solutions for waste management have been found.

Professor Keith Barnham contends that". Far from coming in at 6 grams of CO2 per unit of electricity for Hinkley C, as the Climate Change Committee believes, the true figure is probably well above 50 grams breaching the CCC's recommended limit for new sources of power generation beyond 2030....":

<https://theecologist.org/2015/feb/05/false-solution-nuclear-power-not-low-carbon>

3. WYLFA NEWYDD –A COSTLY DISTRACTION TO CLIMATE CHANGE?

Wylfa Newydd is also a hugely expensive distraction from initiatives to limit the impacts of climate change. According to the latest research we have 12 years to act on climate change before it becomes seriously problematic. Currently Wales

generates no energy from nuclear and the most optimistic scenario for new nuclear generation at Wylfa Newydd **WAS** 2027.

“Prosperity for All – A Low Carbon Wales” (Wales’s commitment to tackling climate change) – Welsh Government March 2019 outlines the 5 sets of regulations that the National Assembly agreed to set in secondary legislation in December 2018 which set the framework for how they plan to account for emissions and what the aims are.

As a result the emissions targets and first two carbon budgets, have been set at the following levels :

- 2020: 27% reduction ›
- 2030: 45% reduction ›
- 2040: 67% reduction ›
- Carbon budget 1 (2016-20): Average of 23% reduction ›
- Carbon budget 2 (2021-25): Average of 33% reduction

Reactors are complicated things to build. A new reactor in Finland is at least 11 years behind schedule, due to problems with the reactor design. Hinkley C was supposed to be producing energy by 2017, but it now isn’t due until 2025 at the earliest. The nuclear industry’s track record suggests it will be delayed even further. Climate change is already happening and we simply can’t wait that long when wind and solar power are so much quicker to install. <https://greenpeace.org.uk/what-we-do/climate/energy/dirty-energy/nuclear-power/>

To reduce global greenhouse gas emissions by 40 to 60 % by 2030, and down to zero by 2050, we need cost-effective, proven energy generation technology that can be scaled up to meet these benchmarks. Nuclear power does not and will not ever meet these criteria. <https://foe.org/nuclear-power-not-viable-solution-green-new-deal/>

The Future Generations Commissioner for Wales White Paper: “Ten Point Plan to Fund Wales Climate Emergency” -June 2019 outlines 10 areas for investment. Under Point 6 She suggests that £200 million be set aside in the next budget (2020-21) for renewable energy :

..... “***“Fund the future through an immediate low carbon economic stimulus for Wales to accelerate investment and action on renewable energy (as well as energy efficiency).”***.....

https://futuregenerations.wales/resources_posts/10-point-plan-to-fund-wales-climate-emergency/

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 . AND there is no need for nuclear power

<https://www.iwa.wales/click/2018/11/the-time-is-now-tick-tock-its-ticking-away/>

The Zero Carbon Britain Project 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

<https://www.cat.org.uk/info-resources/zero-carbon-britain/>

Estimated costs of building Wylfa Newydd lie in the region of 15 -20billion and rising and that does not include waste management and decommissioning. In January 2019 work at Wylfa was suspended by Hitachi due to rising costs and in July 2019 accounts filed by Horizon Nuclear Power Ltd cut the value of the land and equipment by 1.2 billion as it is not intending to build at Wylfa.

4. CLIMATE CHANGE SCENARIOS

4.1 SEA RISE

At the Issue Specific Hearing re. the Application by Horizon for an Order Granting Development Consent for Wylfa Newydd held January 11th 2019 (Item on Climate Change). We asked for reassurance that up- to- date data on sea level rise had been incorporated into the Application for Wylfa Newydd – we were shocked to hear that 2009 data had been used to estimate the likely flood / sea level rise for the site.

From memory the Inspector did make specific reference to 2018 data. Consequently as 2018 data is available and particularly if significantly worse than 2009 data then both Horizon and NRW are taking a view that is dated and possibly inaccurate. It is our view that a full scale assessment of the effect of sea-rise based on 2018 + data must be undertaken before any permissions are granted.

The Welsh Government Report “ Prosperity for All - A Low Carbon Wales states ...” ***The climate is already changing and in the most recent State of the UK Climate 2017 report, trends show the UK climate is continuing to warm and sea levels continue to rise. In terms of the future, the latest set of climate projections for Wales comes from the 2018 UK Climate Projections. The projections apply state of the art modelling to provide detailed projections of climate change up to 2100 (and to 2300 on sea level rise). The projections are showing an increased chance of milder, wetter winters and hotter, drier summers, rising sea levels and an increase in the frequency and intensity of extreme weather events.”***

We need reassurance that the Business case for Wylfa Newydd addresses the issues above in relation to possible extreme weather events.

4.2 FLOODING + STORMS

Flooding at a nuclear power station site can be catastrophic because it can knock out electrical systems, disabling cooling mechanisms and leading to overheating and possible meltdown. Flooding at the Fukushima Daiichi plant in Japan as a result of the March 2011 tsunami caused severe damage to several of the plant's reactors.

TAIPEI (Taiwan News) October 14th 2019 reported”As Typhoon Hagibis hammered Japan on Saturday (Oct. 12), thousands of bags containing radioactive waste have reportedly been carried into a local Fukushima stream by floodwaters, potentially having a devastating environmental impact.

According to [Asahi Shimbun](#), a temporary storage facility containing some 2,667 bags stuffed with radioactive contaminants from the 2011 Fukushima Daiichi nuclear disaster was unexpectedly inundated by floodwaters brought by Typhoon Hagibis. Torrential rain flooded the storage facility and released the bags into a stream 100 meters away.

A number of reports published in 2018 suggest that climate change will impact on coastal nuclear plants earlier and harder than the industry, governments or regulatory bodies have expected, and that the safety standards set by national nuclear regulators and the IAEA, are out of date and take insufficient account of the effects of climate change on nuclear power.

<https://www.nasa.gov/feature/goddard/2018/new-study-finds-sea-level-rise-accelerating>

It is our contention that the case made for Wylfa Newydd by Horizon has not given sufficient attention to the latest predictions on how climate change could affect future weather patterns in the UK particularly around sea rise and possible flooding .

The IPCC says sea-level rise is not expected to kick in for some time. BUT the most comprehensive research conducted by NASA shows that the 2013 IPCC estimates of sea-level rise are thought to be outdated. The IAEA's current global safety standards were published in 2011. These relate to a projected sea level rise of 18- to 59-centimeter by 2100 in the IPCC assessment report of 2007.

Since 1970, the magnitude and frequency of extreme sea levels have increased throughout the world and sea level rises are accelerating claims the NASA Report. Professor Steve Nerem (member of NASA's Sea Level Change Team) says this acceleration has the potential to double the total sea level rise projected by 2100 when compared to projections that assume a constant rate of sea level rise. If the rate of ocean rise continues to change at this pace, sea level will rise 26 inches (65 centimeters) by 2100 -- enough to cause significant problems for coastal sites

<https://www.nasa.gov/feature/goddard/2018/new-study-finds-sea-level-rise-accelerating>

Sea level rise + high tides and a storm surge, increases the risk of coasts and nuclear stations being swamped, (Michael Mann, Director of the Earth System Science Center at Pennsylvania State University.) There have been many close calls of major problems caused by storm surges “Nuclear stations are on the front line of climate change impacts both figuratively and quite literally,” Mann says. “We are likely profoundly underestimating climate change risk and damages in coastal areas.” <https://ensia.com/features/coastal-nuclear/>

4.3 OTHER EFFECTS OF CLIMATE CHANGE

Nuclear technology does not adapt well to climate change and can only operate under predictable and controlled conditions. Nuclear power stations require massive amounts of water and droughts and heatwaves are becoming more frequent. Reactors in France had to be shut down during the recent heat wave because their cooling waters were too warm to be discharged without causing damage to ecosystems.

www.independent.co.uk/news/world/europe/france-nuclear-reactors-shut-down-edf-europe-heat-wave-a8477776.htm