

Approaches to Adopting DESNZ Requirement Discharge Unit for SeaLink

I disagree with the rationale put forward by NGET. Although it may be 'likely' (ref 1.1.1) that DESNZ may establish a Requirement Discharge Unit, it is not certain at all. There is no guarantee that this will be during a timeframe which would facilitate any meaningful contribution to the SeaLink project, nor is there confidence that resources or expertise would ever be available.

As noted by the Applicant the Fingleton review's recommendations were 'focussed primarily' on the nuclear industry. My lived experience over 22 years as a member of the Sizewell A & B Sites Stakeholder Group (SSG) previously called the Local Liaison Community is that the nuclear industry benefits from a robust structure established from the Energy Act 2004 of nuclear regulators (ONR and EA) working alongside local authorities to discharge requirements, which enables informed community consultation. The Inspectors in ONR and EA spend considerable time on site, visiting and monitoring, observing exercises and sampling processes. The Regulators and Site Operators (NRS and NWS) report to the community, the SSG role is to hold them to account and act as a conduit between the industry and the public, and they have built up an environment of trust.

As 'at arm's length' government body, the NDA (Nuclear Decommissioning Authority) again established through the Energy Act 2004 is the closest to the proposed new unit but does not have any spare capacity to flex to take on this role, having just increased to accept the AGR fleet decommissioning project, and being subject to recent review of staffing levels, and reduction of budget. It has just celebrated 20 years of operation working in partnerships with SSGs.

Any new DESNZ unit would require significant time and resources to attain this level of knowledge and ability to be able to effectively manage discharge requirements for the nuclear industry.

And only IF the outcome of an evaluation of the new DESNZ unit is that it can effectively support expansion will the unit consider non-nuclear matters. So hardly 'likely'!

I also disagree with the assessment therefore that it is (ref 1.1.4) 'prudent to seek to anticipate the establishment of this DESNZ unit'. The Applicant is grasping at straws. There are so many vital matters that remain unresolved as we approach the conclusion of the 6month DCO examination that they are attempting to provide a 'catch-all' that they believe will favour their approach. The Applicant is proposing to circumvent the current process of local authority discharge following publication and community consultation and to avail themselves of an in-house Gov advisory unit which will have no local knowledge, no local understanding, no previous experience, no relationship with local communities, no staff, no resources, and who is biased towards the Applicant, as it delivers on their national agenda.

In my discussions with representatives from DESNZ working on the SZC project they admitted their role was to 'get the project over the line'. If this is the premiss currently this is the thing that is likely to remain (bias). Discharging requirements has to be by a team who is neutral, not on the side of the Applicant/Developer. It has to demonstrate an evidential analysis and accountability separated from the Gov agenda. Local Authorities (such as SCC and ESC) include elected representatives which the public can hold to account, and select/deselect via democratic practise. And this is the model in place when this DCO began. If ExA is minded to accept this proposed inclusion, I would consider it to be a material change to the DCO requiring a pause, additional time and full consultation.

With regard to Table 2 the wording should not be 'from the date...written notice...the DESNZ unit as been established' it is after an evaluation has concluded the unit can effectively support the nuclear industry and can be expanded to include non-nuclear projects.

I would request that the ExA rejects this proposal.