

From: [REDACTED]
To: Wylfa@pins.gsi.gov.uk
Subject: Statement of common ground
Date: 06 March 2019 18:01:13

to: Wylfa@pins.gsi.gov.uk
re: EN010007-003088-18

I have just discovered the Statement of Common Ground (SoCG) between Horizon and NGET

Having read it carefully I find that I have the following concerns

At s1.2.2 "The purpose of the SoCG is to set out agreed factual information about the application for development consent made by Horizon for the construction and operation of a new nuclear power station at the Wylfa Newydd Development Area"

As NGET have now withdrawn their DCO application, elements of the document are no longer factual. They may have been when it was first drafted, but not since the confirmed withdrawal of the DCO.

At s1.2.3 "National Grid is promoting a second 400kV connection between the Wylfa and Pentir substations."

This is no longer true. I fully accept that should the Wylfa Newydd project gain new life then reinforcement of the network may be required. It is not true that NGET are "promoting a second 400kV connection" as they have withdrawn their DCO. This section requires revision.

My concern with this remaining in the document is that should the Horizon DCO be accepted, this would "lock in" the need for a second 400kV OHL connection. I would request the ExA obtain a statement from both Horizon and NGET, that they both agree that until NGET submit a (new) DCO application, and that this examined and approved by the proper process, there should be no confirmed solution for the grid connection. Obviously there can be a working assumption, but there should be no confirmed solution.

At s1.4.3 "NGET and Horizon entered into a Bilateral Connection Agreement and a Construction Agreement on 23 December 2008 (Reference A/NP/08/1- 96EN(3)), together referred to as the 'Wylfa Connection Agreements'. These agreements set out the works that will be required to connect the Power Station to the national electricity transmission system (NETS)."

Document ref A/NP/08/1- 96EN(3) does not appear to be in either the Horizon or NGET DCO document libraries. I would appreciate the ExA request a copy of this is placed on the public record.

In their letter to the NGET ExA of February 20th, NGET state "Horizon Nuclear Power has terminated the contract to build a new grid connection for Wylfa Newydd. The North Wales Connection Project was designed to deliver this obligation. Now that the contract has been brought to an end National Grid's application must be withdrawn."

I would appreciate confirmation that document ref A/NP/08/1- 96EN(3) is the contract referred to in this letter

At s1.5.1 "The existing overhead line between Wylfa and the mainland is not sufficient to meet the security and quality requirements for the additional electricity which will be transmitted."

This statement may have been true at the time the SoCG was first drafted, but we have no way of knowing if this will still be true when (should) Wylfa Newydd go ahead, as it will depend on conditions in future editions of the NETS SQSS. Maintaining this statement in the document again "locks in" the recently withdrawn NGET proposal.

At s1.5.1 "National Grid has identified the need to provide a new 400kV double circuit transmission line between the existing substation at Wylfa in Anglesey and the substation at Pentir in Gwynedd"

This is no longer true. With the withdrawal of the NGET DCO there is currently is no proposal for reinforcement of the network. This section requires revision.

At s1.5.3 "An onshore connection was identified by NGET as the preferred technology to connect the Wylfa Newydd Project; comprising a route through Anglesey and North Gwynedd made up of pylons and a tunnel underneath the Menai Strait"

This was true while the NGET DCO was subject to examination, but is no longer true. There is currently no identified technology or proposal. This section requires revision.

At s1.5.4 "Horizon supports the NGET onshore reinforcement, comprising a double circuit overhead line between Wylfa substation and Pentir Substation, as their preferred means of enabling the export of power from Wylfa Newydd."

This cannot and/or should not be true. There is currently no proposed reinforcement. Horizon should not express an opinion on the technology. Horizon have no statutory control over the technology. This section requires revision.

At s1.5.5 "NGET submitted its NWC application for a DCO to the Secretary of State for Business, Energy and Industrial Strategy ('BEIS') on 7 September 2018, the application was accepted for examination on 4 October 2018 with examination expected to commence in Q2 2019."

This requires updating to reflect that the NGET DCO was withdrawn on February 20th 2019 and the NGET ExA confirmed that no further examination would take place. This section requires revision.

At s2.1.1 there is no mention of any consultation that took place that resulted in the Bilateral Connection Agreement and a Construction Agreement on 23 December 2008. The table should be updated to reflect this

At s2.1.1."22nd October 2015, Discussed interactions between the Wylfa project and the 400kV overhead line (OHL)."

I note that discussions were ongoing between Horizon and NGET about the 400kV overhead line (OHL) at the same time NGET were consulting the public on subsea and underground connections.

I hope that my points are acted on as I am sure you will agree that it would be abuse of the process for NGET to get their former proposal "locked in" by virtue of it being submitted to the Horizon ExA.

Pam Lee

