

Gareth Leigh, Head of Energy Infrastructure Planning
Wylfa Newydd Nuclear Power Station Project Team
Secretary of State for Business, Energy and Industrial Strategy
c/o The Planning Inspectorate,
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Temple Quay House
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By email only to wylfa@planninginspectorate.gov.uk

Your ref: EN010007

Our ref: 20011658

21 December 2019

Dear Mr Leigh

Re the application by Horizon Nuclear Power Limited for an Order Granting Development Consent (the "Application") for the Wylfa Newydd Nuclear Power Station

Introduction

We are instructed by Greenpeace Ltd ("Greenpeace UK") – an Interested Party in the determination of the Application – to submit this response to a request for further information and comments made by the Secretary of State for Business, Energy and Industrial Strategy ("BEIS") in a letter dated 23 October 2019.

Greenpeace UK has taken an active role in the Examination of the Application, and on its behalf we have submitted written representations and replies as well as attending and making oral submissions in front of the Inspectors at the Open Floor Hearing on 5 March 2019.

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

Purpose of Response

The Secretary of State's letter of 23 October 2019 refers to the 'relevant' National Policy Statements ("NPS") as EN-1 and EN-6.

The purpose of this response is to remind the Secretary of State of the position with regards to relevant policy in relation to the determination of the Application, and to provide examples of further changes in circumstance since the closure of the Examination period which reinforce the position that any decision to give "significant weight" to the NPS, which supports nuclear new build at the Wylfa B Site, would be plainly erroneous and amount to grounds for judicial review challenge.

In doing so, this response also comments on climate change and the declaration of a climate emergency by the Welsh Government shortly after the end of the Examination.

Greenpeace UK position

The NPS does not have "effect" within the meaning of the governing 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."*¹

The Applicant accepts that EN-6, which had the specific purpose of facilitating the urgent delivery of new nuclear by the end of 2025, does not have effect². The Application is therefore to be decided under Section 105 of the Planning Act 2008 ("*Decisions in cases where no national policy statement has effect*"), and requires the Secretary of State to have regard to a 'wide variety of matters' when deciding the Application, rather than submitting to the prescription of the NPS.

However, the Applicant maintains that the Secretary of State should still attach *significant weight* to the Application. This is contrary to the Ministerial Statement which directs that this is likely only where there has been no relevant change of circumstances³.

¹ 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/>

² Page 4 of the Applicant's Planning Statement

³ 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/>

The Secretary of State is reminded of, and directed to, the overwhelming volume of evidence, demonstrating the changes in circumstance since the NPS, which was based on a 2008 White Paper, was designated in 2011.

Our Written Representation (of 4 December 2018), as well as our Oral Submissions of 5 March 2019 and Post-Hearing Submission of 14 March 2019, give a non-exhaustive list of changes in circumstance for the purposes of Section 105(2) of the Planning Act 2008, which negates the ability of the Secretary of State to attach significant weight to the NPS. These are summarised below and added to where necessary to reflect further changes in circumstance which have occurred since the end of the Examination period and which are relevant for the purposes of the Secretary of State's determination of the Application:

A) Urgent Need

The NPS was a response to the Government's belief that there was an "urgent need" for new nuclear, which was required to be constructed and generating electricity "significantly earlier than 2025". EN-6 identified Wylfa Newydd as one of the 8 sites potentially suitable, provided it could be deployed by 2025.

The White Paper projected the first nuclear power output to be in 2018⁴. Now in the final days of 2019 and none of the designated sites are even close to producing power, and only one site, Hinkley Point C ("HPC") (which is expected to be the world's most expensive power plant of all time⁵ and is currently the UK's largest construction site which is causing exceedance of air pollution in the small Somerset town close to the site⁶), has obtained development consent.

Wylfa Newydd's inability to play a role in addressing the 'urgent need' remains hugely relevant. Not only will it fail to start generating electricity "significantly earlier than 2025", requisite criteria for new nuclear under the NPS⁷, it no longer has any prospect of being built following Hitachi, the parent company of Horizon Nuclear Power, pulled funding over cost concerns and lack of investors.

The categoric failure at every single site, including Wylfa Newydd, to meet the explicit policy deadline of 2025 – which Government deemed necessary to address the urgent need –

⁴ Chart 3: Indicative pathway to possible new nuclear stations, page 136 of the White Paper 2008, available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/22894/4/7296.pdf

⁵ <https://www.theguardian.com/business/2019/jul/27/despite-hinkley-new-plan-nuclear-hardly-better-than-old-one>

⁶ <https://www.theguardian.com/uk-news/2019/aug/14/hinkley-point-c-london-traffic-bridgwater-somerset>

⁷ Paragraph 3.5.9 of EN-1, available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47854/1938-overarching-nps-for-energy-en1.pdf

represents a significant change in circumstances. The reality is entirely different to the prediction that predicated the policy.

By continuing to divert unprecedented quantities of public money and resource away from renewables - which can be deployed quickly and cheaply - and into a demonstrably slow, expensive and risky nuclear industry, the UK categorically fails to meet the NPS objective of addressing the “urgent need” to decarbonise the energy supply.

B) Nuclear and the public purse

In 2008, the White Paper on which the NPS is based, proclaimed nuclear to be “...currently one of the cheapest low-carbon electricity generation technologies.”⁸ Further, in 2011 (shortly after the NPS was designated), the Secretary of State promised that new nuclear would be built “without a penny of public subsidy”⁹.

Today, new nuclear is synonymous with excessive cost, strain on the public purse, and an industry unattractive to investors.

The 2008 White Paper estimated that the price of nuclear energy would be £30/MWh¹⁰. This has proven to be a gross underestimation, taking the HPC deal as an example which is more than three times this amount (and more than twice the wholesale price of power¹¹). The HPC 35 year contract of £92.5/MWh has been heavily criticised by the National Audit Office (NAO) which describes it as having “locked consumers into a risky and expensive project with uncertain strategic and economic benefits.”¹² In contrast the average electricity price in the UK in 2018 was £55-65 /MWh¹³.

The Government has also faced strong criticism from the Public Accounts Committee (PAC) for failing to champion the consumer interest in the HPC deal, despite the cost to the consumer having risen five-fold in the time it took to negotiate the deal.¹⁴

⁸ Page 6 of the White Paper, available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228944/7296.pdf

⁹ Taken from speech on Energy and the Environment at the Liberal Democrat Conference in September 2011, available at: <https://www.newstatesman.com/uk-politics/2011/09/energy-renewable-jobs-carbon>

¹⁰ Para 2.49 of the White Paper on Nuclear Power (January 2008) *Department for Business Enterprise and Regulatory Reform*, available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228944/7296.pdf

¹¹ <https://www.theguardian.com/news/2017/dec/21/hinkley-point-c-dreadful-deal-behind-worlds-most-expensive-power-plant>

¹² Paragraph 25, Conclusion on Value for Money, National Audit Office Report on Hinkley Point C, 23 June 2017, available at: <https://www.nao.org.uk/wp-content/uploads/2017/06/Hinkley-Point-C.pdf>

¹³ <https://www.theguardian.com/environment/2019/jul/14/new-uk-nuclear-funding-model-could-leave-taxpayers-liable-edf-sizewell>

¹⁴ Hinkley Point C Inquiry, Public Accounts Committee report, taken from the Summary, available at: <https://publications.parliament.uk/pa/cm201719/cmselect/cmpubacc/393/393.pdf>

The NAO also warns that a UK withdrawal from Euratom following the UK's departure from the European Union may be interpreted as a change of law which could effect a change in the HPC contract price or trigger termination and compensation payable to EDF under the Secretary of State Investor Agreement arrangements.¹⁵

In relation to Wylfa Newydd, Hitachi withdrew earlier this year over financing concerns, despite the reported strike price of £75-77/MWh¹⁶ for a 60 year deal, and despite the UK's commitment to direct investment (which in 2018 was predicted as a stake of at least £5 billion¹⁷, but reported in the Japanese press as arranging the entire 2 trillion yen that Hitachi had requested¹⁸). Further, the package offered from the public purse was described by Business and Energy Secretary, Greg Clark, following Hitachi's suspension of UK nuclear development, as having gone "...beyond what any government has been willing to consider in the past."¹⁹

At other sites, there have also been withdrawals – Toshiba at the proposed Moorside nuclear new build site in Cumbria, for instance. The cost of this withdrawal has cost Toshiba £100 million, yet it described this as the "*economically rational decision*"²⁰.

Following a public consultation, the Government is now considering the Regulated Asset Base (RAB) model for financing new nuclear. This model, which has limited experience financing projects of this scale²¹, intends to "unlock revenue from the eventual users"²², i.e. make consumers pay upfront for energy they may not use until more than a decade later.

This RAB model represents yet another controversial departure from the "subsidy free" nuclear promise of the NPS. The NPS objective of protecting consumers and offering subsidy-free nuclear power has plainly not been met and cannot be met. The long term financial viability of these sites has already been undermined and represents a clear change in circumstances for the purposes of section 105(2) of the PA 2008, which negates the ability of the Secretary of State to give significant weight to the NPS as the Applicant directs.

¹⁵ Paragraph 3.17 of the National Audit Office Report on Hinkley Point C, 23 June 2017, available at:

<https://www.nao.org.uk/wp-content/uploads/2017/06/Hinkley-Point-C.pdf>

¹⁶ Reported by the Solar Trade Association, 'Press Release: Billions for Wylfa Nuclear Power, while Low-Cost Solar still shut Out Of Competitive Markets?' 4 June 2018, available at: <https://www.solar-trade.org.uk/press-release-billions-for-wylfa-nuclear/>

¹⁷ Reported by the Guardian, 'UK takes £5bn stake in Welsh nuclear power station in policy U-turn', 4 June 2018, available at: <https://www.theguardian.com/environment/2018/jun/04/uk-takes-5bn-stake-in-welsh-nuclear-power-station-in-policy-u-turn>

¹⁸ Article from the Nikkei Asian Review, Business Deals, 'Hitachi clears financing hurdle on British nuclear plant', 5 June 2018, available at: <https://asia.nikkei.com/Business/Business-Deals/Hitachi-clears-financing-hurdle-on-British-nuclear-plant2>

¹⁹ 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>

²⁰ Reported by BBC Business News, 'Toshiba's UK withdrawal puts Cumbria nuclear plant in doubt', 8 November 2018, available at: <https://www.bbc.co.uk/news/business-46122255>

²¹ <https://www.nic.org.uk/assessment/national-infrastructure-assessment/low-cost-low-carbon/>

²² <https://www.power-technology.com/features/regulated-asset-base-model-uk-nuclear/>

C) Cost of Renewable Energy

A further fundamental change in circumstances since the NPS was designated is the cost of renewable energy.

The White Paper's criticism of renewables was that they would be more expensive than nuclear²³. The position at the end of 2019 could not be more different.

Whilst the cost of nuclear, including nuclear construction, continues to rise and lock consumers in to years of high rates, solar PV has produced a 90% reduction in costs in the last decade²⁴ and wind power continues to fall with record-low contract prices being awarded in September 2019 for £39.65/MWh²⁵.

Further, if the market follows the Government's reference price expectations, then the new renewable schemes will pay more than £600m towards consumer bills by 2027, instead of receiving a subsidy.²⁶ What's more, these wind farms will be generating electricity by 2023.

Further, the Offshore Wind Sector Deal has a target of target of 30GW of power by 2030 and 27,000 jobs (a third of which are to be filled by women)²⁷. 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 the World Nuclear Association reports as having peaked at 25% in the late 1990s.²⁸

It was also announced within the documents accompanying this month's Queen's speech that the Government has increased its target for offshore wind to 40GW by 2030²⁹.

The dogged pursuit of new nuclear under the auspices of outdated policy represents a clear delivery risk in relation to cost to consumers and to emissions targets. Further, it is clear that the industry acknowledges that renewables are outperforming nuclear and that "the sector needs to respond"³⁰, despite not knowing what such change should look like³¹. To place significant weight

²³ Para 2.31 of the White Paper

²⁴ <https://www.energy-reporters.com/storage/pv-already-below-average-power-price-study/>

²⁵ <https://www.carbonbrief.org/analysis-record-low-uk-offshore-wind-cheaper-than-existing-gas-plants-by-2023>

²⁶ <https://www.carbonbrief.org/analysis-record-low-uk-offshore-wind-cheaper-than-existing-gas-plants-by-2023>

²⁷ 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

²⁸ World Nuclear Association, January 2019:

<http://www.world-nuclear.org/information-library/country-profiles/countries-t-z/united-kingdom.aspx>

²⁹ Page 116

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/853886/Queen_s_Speech_December_2019_-_background_briefing_notes.pdf

³⁰ <http://www.nwnucleararc.co.uk/assets/The-North-West-Nuclear-Arc-Science-and-Innovation-Audit-2018.pdf>

³¹ *Ibid.*

on the outdated NPS which cites renewable energy as prohibitively expensive in comparison to nuclear is irrational, misleading and damaging to the consumer and the climate.

D) Energy Security

The policy justification that nuclear is baseload and renewables are unreliable³² is now woefully outdated, as discussed by former Head of National Grid, Steve Holliday³³; independent energy analysts, Aurora³⁴; and the National Infrastructure Commission³⁵. This position was also discussed in oral evidence in front of the Business, Energy and Industrial Strategy Committee in June 2019 by Chris Stark of the Climate Change Committee, who said that it is 'not necessary to have nuclear power'³⁶ and accepted that it would be possible to only have HPC in the system, i.e. that Wylfa Newydd is not required.

Further, 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)³⁷ states that "*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*".³⁸

In addition, the Government accepts that on cost and on the 'abundance of alternative technologies' "...**nuclear is being out-competed**"³⁹. These new technologies include not only renewable sources but also smart grids, digitising the management of intermittency, and power storage such as lithium-ion batteries (which have fallen in cost by 79% since 2010 and now have a development pipeline of 7GW of storage projects, 3500 times what was deployed in 2010)⁴⁰.

³² Paragraph 2.31 of the White Paper 2008, available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228944/7296.pdf

³³ <https://energypost.eu/interview-steve-holliday-ceo-national-grid-idea-large-power-stations-baseload-power-outdated/>

³⁴ Aurora Energy Research, '*The new economics of offshore wind*', January 2018, available at: <https://www.auroraer.com/wp-content/uploads/2018/01/The-new-economics-of-offshore-wind.-Aurora-Energy-Research-Report..pdf>

³⁵ National Infrastructure Commission report, March 2016, '*Smart Power*', available at: <https://www.nic.org.uk/wp-content/uploads/Smart-Power.pdf>

³⁶ <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/business-energy-and-industrial-strategy-committee/financing-energy-infrastructure/oral/103082.pdf> Q.15

³⁷ 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>

³⁸ 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>

³⁹ Greg Clark, Secretary of State for Business, Energy and Industrial Strategy, 17 Jan 2019 <https://hansard.parliament.uk/Commons/2019-01-17/debates/9C841326-B63A-4790-867F-905DEDDDD8AC/NuclearUpdate>

⁴⁰ Bloomberg Report, '*Fossil Fuels Squeezed by Plunge in Cost of Renewables, BNEF Says*', 28 March 2018, available at: <https://www.bloomberg.com/news/articles/2018-03-28/fossil-fuels-squeezed-by-plunge-in-cost-of-renewables-bnef-says>

Renewable energy can no longer be discounted for unreliability as it is under the NPS. This represents a further change in circumstance for the purposes of the determination of the Application under s105(2) PA 2008.

E) Radioactive Nuclear Waste

Warnings have been issued since 1976 against building new nuclear reactors until the problem of management and disposal of radioactive waste had been solved⁴¹. The 2008 White Paper also cautioned that ‘interim’ facilities should be used until geological facilities become available⁴². The NPS (EN-6 para 2.11.3) admits that whilst geological storage is ‘technically achievable’, interim storage could be used until it is.

It is wholly unreasonable for ‘interim’ to be indefinite. The problem of how to safely store radioactive nuclear waste remains unsolved. For decades governments have failed to find a community willing to host this growing stockpile of high-level radioactive waste.

Making the problem bigger by approving nuclear new build makes it both more urgent, and more difficult to solve. Yet Wylfa Newydd intends to increase the total level of radioactivity of UK nuclear waste by 70%, and as an ‘interim’ solution, to store it on site for a century.⁴³

The Secretary of State should not be satisfied that the Wylfa Newydd project can exploit the outdated policy interpretation of an ‘interim’ method of on-site storage of highly radioactive nuclear waste.

To saddle future generations with the burden of this growing stockpile of dangerous waste would be irresponsible 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

⁴¹ Paragraph 518 of the Royal Commission on Environmental Pollution report presented to Parliament in September 1976, available at: <https://webarchive.nationalarchives.gov.uk/20110322144120/http://www.rcep.org.uk/reports/06-nuclear/1976-06nuclear.pdf>

⁴² Page 83 of the White Paper 2008

⁴³ According to Radioactive Waste Management Limited, available at: <https://rwm.nda.gov.uk/publication/differences-between-2013-and-2010-derived-inventory/>

responsibility to future generations or meet the requirements of the Well-being of Future Generations Act.”⁴⁴

Also relevant is that when the NPS was designated, the UK was part of Euratom, and therefore party to rules and research on nuclear material and how it is moved around. But Government has decided that leaving the European Union means leaving Euratom. This is likely to mean potentially huge changes to the way nuclear businesses operate. There is also no clarity on security of movement of highly hazardous and indestructible waste in Europe or the basic logistics of how it will work after the UK's departure from the European Union.

Therefore, both in respect of the unreasonable extension of concept of the 'interim' solution in the NPS to the management and disposal of radioactive waste, and the likely impact of withdrawing from Euratom, significant weight must not be attributed to the NPS for the purposes of determining the Application under section 105(2) of the PA 2008.

F) Climate Change and climate emergency

EN-1 anticipated that for the UK to meet its climate change objectives, there was an urgent need for new nuclear power generation⁴⁵, and that such new nuclear would need to be “**generating energy as soon as possible and significantly earlier than 2025**”⁴⁶. As previously discussed, none of the sites will be generating power by this deadline. EN-6 also accepted 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.*”⁴⁷

Nuclear newbuild has manifestly failed to contribute to the climate change targets in existence at the time that the NPS was designated, i.e. that greenhouse gas emissions are reduced by 80% on 1990 levels. This target has now been superseded by a more ambitious legislative target⁴⁸ in light of the Paris Agreement and warnings of the Intergovernmental Panel on Climate Change (IPCC) and the Committee on Climate Change (CCC) of net zero emissions by 2050, and reinforces nuclear newbuild's inability to make a meaningful contribution in time.

Additional developments which have taken place to demonstrate the outdated policy objectives of the NPS include:

⁴⁴ 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>

⁴⁵ Paragraph 3.5.1 of EN-1

⁴⁶ Paragraph 3.5.9 of EN-1

⁴⁷ 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-volume1.pdf

⁴⁸ Climate Change Act 2008 (2050 Target Amendment Order) which came into force on 27 June 2019.

- 1) 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;
- 2) 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 supplies⁴⁹ but warns that all scenarios would require **rapid and far-reaching transitions in energy**, land, urban and infrastructure, and industrial systems⁴⁹; and
- 3) Scientists writing in the journal, Nature (November 2019) have warned that the world is at risk of crossing a series of ‘**tipping points**’ where particular impacts of global heating become ‘unstoppable’ and call for urgent international action⁵⁰;
- 4) The UN warned that countries must make an ‘unprecedented effort to cut greenhouse gases in the next decade to avoid climate chaos’ (November 2019)⁵¹; and
- 5) Following the Paris Agreement, a growing climate movement, peaceful direct action in the UK and internationally, including by Greenpeace and other NGOs, and youth strikes inspired by the example of Greta Thunberg and Extinction Rebellion, the Scottish, UK and Welsh parliaments have voted to recognise that we are now in a **climate emergency**.
- 6) The Welsh Government has also published its draft National Development Framework which makes promoting renewable energy, such as wind and solar, one of its key policies, and emphasises the need for “rapid decarbonisation”.

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.**”⁵²

⁴⁹ <https://www.businessgreen.com/bg/news/3064052/ipcc-limiting-warming-to-15c-requires-a-net-zero-global-economy-by-2050>

⁵⁰ <https://www.nature.com/articles/d41586-019-03595-0>

⁵¹ <https://www.theguardian.com/environment/2019/nov/26/united-nations-global-effort-cut-emissions-stop-climate-chaos-2030>

⁵² Available at: <https://www.theccc.org.uk/publication/reducing-uk-emissions-2018-progress-report-to-parliament/>

Changes in the UK's knowledge of, and response to, climate change, as well as a national and international acceptance by people and governments that we are in a climate *emergency*, since the NPS was designated, represents a significant change in circumstances. Any decision to give significant weight to an NPS with such outdated climate change aspirations, and which is clearly unfit for use in today's climate change emergency reality, would be wholly irrational.

Conclusion

The Applicant claims that there have been no relevant changes in circumstance which would suggest that anything less than significant weight should be given to the NPS. Greenpeace UK find this claim to be erroneous and misleading.

As we have set out throughout the Examination of the Application, the evidence of relevant changes in circumstance since the designation of the NPS is overwhelming and mounting.

Despite a powerful nuclear lobby and unprecedented government finance which has caused substantial harm to the consumer, nuclear newbuild, including at the Wylfa Newydd site:

- a) Is uneconomical for the public purse and unviable for commercial investment;
- b) Represents a monumental failure to contribute to the emissions reductions targets under the Climate Change Act 2008, let alone the enhanced targets contained in the Climate Change Act 2008 (2050 Target Amendment Order);
- c) Obstructs the deployment of quick, reliable, zero subsidy renewable alternatives; and
- d) Saddles future generations with a legacy of lethal radioactive waste without solution.

Renewable energy on the other hand, such as wind and solar, has proven itself capable of rapid expansion, deployment and energy capacity, without causing a burden on the public purse, and in line with swiftly developing clean technology. In other words, true renewable energy can answer the urgency demanded by a climate **emergency** in a way that has not, and will not, be achieved by nuclear.

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 Secretary of State should not, and must not, attach significant weight to the NPS in determining the Application for the Nuclear Power Project at Wylfa Newydd.

Yours faithfully



Harrison Grant