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00:05

Welcome back, everyone, their hearing is resumed. So the next agenda item is to D. That's the scale and urgency of the need in the light of national energy policies overall. So the applicants planning statement update relies upon the more recent analysis, which has informed the energy white paper to confirm the scale and urgency of the need. Its position is that the need case set out in the MPs are to be treated as authoritative, and up to date statements of government policy. So what I was looking for at this agenda item is for people just to provide their summary positions in relation to scale and urgency of need. So if I could perhaps ask the staff at council first to just summarise and outline its position in relation to need.

01:02

Thank you, Madam Andrew at Suffolk Council. For this purpose, one needs to look at n one. And n one makes it clear that scale of any energy infrastructure is not constrained by the policy and paragraph 312 of the N one. And 324 make it clear there are no targets or limits. That's the first point. Second point is that in relation to and that applies, also to new nuclear power. Secondly, specifically in relation to new nuclear power generation, the urgency of that is set out in paragraph 351. There's an urgent need for new electricity generation plants, including new nuclear power, and also 359, which is headed the urgency of the need for new nuclear power. Thirdly, that therefore engages three to three within the terms are within lan one in its own terms, that as a starting point, to use the language of the Court of Appeal, substantial weight in 313, and 323 should be given to considerations of need. And then, fourthly, of course, that needs to be balanced against adverse impacts that doesn't come under this head. But of course, these don't necessarily Trump the issues as to the acceptability of adverse impacts and whether the mitigation of compensation is adequate. And there are a large number of matters on which we are still pressing the applicant to seek to improve that position.

03:12

Thank you very much for that. So if I could hear from Suffolk County Council.

03:21

Thank you, Madam Michael Bedford, Suffolk County Council, Mr. Tate on behalf of the District Council has directed you to effectively the same point. And he's also in his final remark made exactly the point that we have already made about the need to balance any way that you give to urgency of need against the adverse effects. And I don't rehearse again, all our points, which I think you will understand on that. Thank you for that.

03:45

Thank you. Well, if I could hear from Doug Parr of Greenpeace, please.

04:03

Thank you. I'm sorry, I wasn't expecting to be called for this one. But my Oh, you did have your hands up. Mr. Irwin. Is that a historic? Sorry, I'm sorry. That needs to be lowered.

04:18

Right. So if you want to come back on another item, that's fine. I wasn't expecting to speak to this one. I believe that that's fine. I simply asked you because of the hands up okay. That we can pass and if I move on now to Ian rules, and I hope that's not a historic hands up as well.

04:44

No legacy hand here. I've got my camera. Yeah. All of the talk of urgency. That wishing, wishing to state the obvious nuclear power only generates electricity now. electricity generation accounts for about 30% of the UK is overall co2 emissions. UK power plants generate at best 20% of our electricity. That means currently nuclear power plants are contributing about 6%, cutting our co2 emissions. And that assumes that nuclear power doesn't have any co2 footprint, which it does and we'll hope to touch on later. I think the point that Friends of the Earth would like to make here there are other much faster ways of producing the necessary cuts in co2 emissions, which, which don't lead to the economic, political, scientific engineering and social wailing and gnashing of teeth associated with the potential building of a nuclear power plant. There are much better ways of doing that, and things which are deployable in a much shorter time span. And that's, that's what we wish to say on this at the moment.

05:53

Thank you. Steven Thomas. Thank you. Sorry, sorry. I can barely hear myself. So I don't know if I need to go out and come back again.

06:30

There's a bit of an echo. And yes, we're hearing a lot of noise, but not you, Mr. Thomas. So perhaps you could leave and come back again, or get some advice from the case team. And we'll fit you in when you can write you there. Let's see if that works. Okay. Could you What about turning your camera off and see if that? Some have a word with the case team and see if you can rejoin by phone? Okay, okay. Try that. Try that because that's right. So if I can hear from Neil Crumpton, please. Hello there.

07:57

My name is Neil Crumpton. I'm kind of leading on this for together against size We'll see. And just for a bit of background, I am a retired electrical engineer. And I work for Friends of the Earth, was an energy specialist for about 16 years and served on various government committees including low carbon assessment technologies. And there's no doubt that there's a clear need for the quick decarbonisation of the electricity sector and a need for reliable electricity generation, considering the amount of renewables that are likely to be coming on the system. When I say reliable, I prefer to call it dispatchable. dispatchable means that it can be generated very quickly from when renewables don't provide sufficient output to the grid. Nuclear is essentially baseload, although it can reduce its outputs. It's essentially baseload. So the question of need comes down to the points in terms of size we'll see is can it reduce emissions, which is the best fit in terms of decarbonizing before 2035 as well as after 2035 and providing, I would say dispatchable, rather than baseload power. There's no doubt that the government's place a lot of weight on the modelling system they have it's called the dynamic dispatch

model the DDM. I noticed the ministers make considerable reliance on This Select Committee in January. And just to be aware that they're not, it's not just comparing nuclear inclusive scenarios with renewables only. But also with renewables and carbon capture, and or use and storage as well, that's a separate, distinct set of scenarios that should be considered. And indeed, because the government's are progressing carbon capture and storage and use technologies, that is the likely pathway, they would, they are going at the moment. So. So the modelling is key to their statements in the energy white paper. And in all previous statements, they would rely heavily on their modelling. However, the government have made it clear that their modelling is continually being updated, they do release reports on the government website. And indeed, the inputs to the software are changing all the time as technology costs fall or this and that policy comes into force. And so that sense, the need as defined by the model can be changing all the time. So in terms of what is changing the modelling, I would suggest that several things have come forward since the energy white paper I the base hydrogen strategy, which was released last week, and the climate change committee's recent reports, where they're talking about an estimates or a forecast of a need for a considerable amounts of hydrogen demand, rising to towards 2050. I would also say that the government's model also needs to be informed by the biomass strategy, which they say will be published in 2022. Now personally, I think

12:14

doing any modelling, without including biomass as a potential use within the electricity sector, is completely insufficient, it almost makes a nonsense of it lectricity one could use biomass for aviation, but aviation is non essential, whereas electricity is highly essential. And biomass can provide dispatchable electricity generation as well. And also storable hydrogen and carbon negative hydrogen if you're using it with carbon capture and storage. So there's all these technology aspects feeding in to the model, which informs the Minister and the the need, can I just say that the base hydrogen strategy is estimating demand for hydrogen gas between 250 and 450 terawatt hours a year by 2050. And similarly, the climate change committee is estimating something like 300 terawatt hours of hydrogen gas per year by 2050. This is nowhere included in the modelling really, they've mentioned 20 terawatt hours in their electricity generation. But that's an input that they've selected the the staff members have selected without much explanation. And it's way below the demand now been forecast by themselves and the climate change committee. And they also this modelling also depends on natural gas being used for the hydrogen generation that they do assume. Now, it's generally regarded by numerous authorities that green hydrogen that produced by electricity electronically through electrolyzers is likely to be as cheap, if not cheaper than natural gas reformed with carbon capture by 2030 to 2035. So the model itself is really does need to include assessment of green hydrogen in its future updates, and indeed, the huge amount they're, they're now forecasting will be needed. I think both these aspects the high hydrogen demand and the use of curtailed electricity which there is a lot of in the renewal both scenarios in their modelling can be used for this green hydrogen production. And I think those would transform the outputs of the existing model and lead to some very different conclusions as to the statements of need at the moment. I think this has, in terms of policy, I would say this has implications for the habitats directive, and the need of the eiropas. a need for a scheme on this site at this well, in 2035. Think that's what I would like to say. But just to summarise that the government's reliance on the DDM model, which is our has many arguments against it, is quite well, hi are very strong. And it is insufficient at this time, for numerous reasons. I've just stated to base too much reliance for size we'll see on the existing modelling. Thank you very much.

16:12

Thank you, just to say there is that there was an item later on, on modelling itself. But obviously, I'll take on board what you've said just now. But really, I was just checking your position or about I believe you said you represent sent we're representing task, and that's in relation to the need at the moment, as it's seen in in national energy policies. So fat Thank you. Frankie. Alison downs did have her hand up. But that's gone down. Do I assume that your points been made?

16:51

It was precautionary hand and as mkhaya in case Professor Tom has had trouble rejoining the meeting, he is back in if he still has sound issues, then then I'd like to come back and, and make some points that he's planning to make. Thank you. Right, Professor Thomas. I hope that's better this time. That is better. Thank you, God.

17:23

What I'd like to address is the question whether cite the project here sighs well see, meets the criteria can meet an urgent need. And I think we need to, to go back to the beginning of the process, which was 2013 when the planning process began, and after eight years, we are no foot we are where we were with Hinkley after four years, so we are being delayed. In 2018, EDF was saying that the the plant would come online in 2034. That is still I believe their forecast position. But there have been delays already, for example, on the timing of the final investment decision, which has gone back a couple of years. But let's look at the technology itself, a nuclear power. There are about six current designs of nuclear power plant that has seen significant construction or completion. All of those projects, every single one has been significantly delayed, typically by five years, and in some cases by more than a decade. So nuclear power, as a whole does not have a good record. Of those half a dozen technologies. The record of EPR is demonstrably worse than any of the others. There are four plants that have had significant amount of construction to were five years late. And the other two were more than a decade late. So in terms of the reliability of this technology of the EPR meeting time schedules, it's very poor. If we look at EDF record over the past 30 years, it has completed 10 nuclear power plants and one is reportedly near completion. All things 11. The earliest fives are about four years late on average, whereas the most recent five are between six and 11 years late so EDS record it would be hard to imagine a worse record than that. They are currently sorry Professor

19:48

Thomas, sorry to interrupt you but I at this stage under this agenda item. I was really looking to check what your position was on what the A policy said about a need and urgency of it at this stage, rather than whether this particular project could meet that. And I'm just wondering if this contribution might be better under item four, B, which was the anticipated extent of the project's contribution to satisfy me.

20:25

I'm happy to come back then I've just about finished. But yeah, so I'm happy to come back then if it would be more appropriate.

20:33

Is that something that either yourself or Alison downs would like to say, actually, in relation to need as expressed in national policies overall? Did you want to sum up your position? I don't know if you're the best person for that for stop. sighs We'll see. I think Allison would be better. Or should I just go to Alison, then.

21:01

Thank you Miss MCI. And our position is that size we'll see is not needed. And the most ambitious energy scenarios as previously discussed, and don't include size We'll see. And that, you know, our expectation would be for an evolution of policy thinking, you know, in the short to medium term, that would mean that, you know, given the timescale for the delivery of science, well say that, you know, by the time it was ready to generate electricity, the energy landscape would have been transformed, and it would be no longer required. And, given the council's position, which we share, about the importance of assessing the balance of the impacts against the benefits, we assert that size will see very much does not outweigh the impacts. Thank you. Wayne Jones.

22:02

Yeah, good times, MCI, I want to apologise first for not introducing myself properly before. I wasn't expected to come in at that point. My name is Wayne Jones. I'm not representing anybody but myself, though I did represent various groups in Wales in the past on the issue of nuclear energy. And I'd like to I'm a very I'm a stickler for detail when it comes to need, I don't just look at the vagaries of having to generate electricity supply that's needed by people, but how people can use that supply. And one of the things that worries me and it comes back to what Neil Crumpton was saying, and I've got great respect for the man, but one place in which I depart from what he says, is the use of bio mass to produce electricity. Now, I've always believed for many, many years now, that biomass, wood energy, other things like that, have definitely got a place in our primary energy structure. And it's really very important at the moment to realise that, with the extreme weather that we're getting, there's nothing to say that we're not going to get extreme winter weather as well as extreme summer weather. And that's borne out this winter with blizzards and all sorts, especially in places like Scotland. And in the past, in serious winters like 1963, we could rely on coal when the when the wires went down, and the electricity wasn't running. And of course, now with coal being off market, gas is dependent on electricity. Our home heating and our own cooking will rely on what if we do come into a severe winter weather in the future scenarios being projected by government and other people. So all I'd really like to say is that, I mean, like I've been referred power counties like powers and COVID have got high forestation. David county council actually presented a scenario, avoid energy replacing coal. It's a rural area. If you cut off in winter, no one's gonna come and help you and you're left without any heating. And this happened in Merthyr in the 80s when the whole town lost its heating but in because it was, you know, in a situation where they were, they were in a town, they those people for the whole Christmas for two weeks were without power, and they could get in community centres and things. Now, if we just looked at electricity, we're putting people at risk in the rural areas. And the reason I'm bringing this up here is because Suffolk traditionally has a cannabis industry. And it also has in the past been the traditional Centre for hemp production, and to allow sufferer to actually go back into their traditional skills and values will bring to their economy. much needed jobs work if sizeable doesn't go ahead. So, you know, that's where I would differ in this particular case with with Neil Crumpton on the biomass. That's all. Thank you. Councillor Marion fellows.

25:23

Thank you. Miss MCI Listen, gentlemen, customer and fellows on behalf of overtone counsel. Yes, there's just a couple of points in terms of this. The other thing that we haven't figured in into is the continuing extension of size will be it's already had its lifetime extended, or ready, at least till 2035. And I understand that it will go at least probably until 2045, or at least into the 40s. And that needs to be figured into the the equations that we're looking at. And as recently as the end of July this year, Bayes is calling for evidence on the next generation of nuclear reactors. And he's proposing significant funding 170 Moon, I understand into developing and delivering what's called da Rs, and also the high temperature gas reactors, they say to be delivered as early as the 2030s. So not only should we be looking at what the current mix is, and what the projected mix is, but also the extension of the existing sites, and the fact that that our needs as a nation are going to be changing. So the need and therefore the urgency, and I think those things are two intrinsically linked together. The other thing that we're forgetting, though, is that it's the need for the nation to have a project, not not necessarily here. And I think the trouble is that the applicant is relying very heavily in its deliberations today, and also in its evidence with yourself. That is because of national policy that we need size or see if it is proven that national policy needs nuclear in some form or another, that doesn't equate to actually being here at size We'll see. And I think that's the bit of the jigsaw that we're not including, or keeping in mind today. So it's made for the nation in terms of output, but not necessarily for what's being proposed currently, especially in the light of all the changes, nor the reviews that are really hotly taking place now that we could all benefit from. Thank, thanks.

27:48

Can I hear from Rick and Scott, please? Thank you may be muted. Mr. Scott, are you muted?

28:09

I can't hear you. Can I just check with the case team? If everybody else can hear? No, it looks as if Mr. Scott is on mute. Mr. Scott, you are on mute. So we can't hear what you're saying at the moment.

28:29

It's said that I wonder if if we could come back to Mr. Scott. And in the meantime, if the case team could message Him and ask Him to check the disk, he can unmute himself.

28:52

Is that possible? Can I ask the case team to do that? I think it might be better if Mr. Scott leaves the meeting and then tries to rejoin or I so hope Mr. Scott has got that message. Otherwise, if the case team could relay that to him, and then we'll bring him in again. So I do have he enrols of Friends of the Earth. I don't know if that's a legacy hands up on this or if there's something else Mr. Rose wants to add?

29:28

No, it is not the date hand. Thinking we've heard we've had 70 years of nuclear power in Britain, I think give or take in all that time. All it's managed to do is generate 20% of electricity. I don't consider that to be a particularly fantastic result for the billions of pounds that have been spent on it over the years and

plus the intractable waste problem that's resulted from all of this. It's, it's now well always has done but it is now increasingly apparent that is is caught in demand. It's opportunity cost and it sucks money away from other more truly sustainable and renewable alternatives. And we've got the example from the 1970s. possibly one of more egregious examples when professional sold 20th wave power schemes were stymied by false reporting by the nuclear industry, which made them out to be more expensive. And I suspect a similar process is carrying on now. Nuclear power has to be has to be promoted at all costs. Why I have my own theories on that as Friends of the Earth, which may be outside the remit of this, but in terms of what's actually been achieved over the over the lifespan of nuclear power in Britain, it's really not that impressive. I don't think I really, okay. And then we'll see how that goes, shall we? Okay, I'll leave it there.

30:44

Thank you. You were interrupted. Apologies for that. I did catch what you were saying. The right till the end. Right. Can I just check if Mr. Scott's available yet? And that case, I'll get I'll go to Pete Wilkinson in the meantime. Yes, thank you, Miss macaque. Can you hear me? Yes, I can hear you.

31:21

Thank you. Can I just address a few points about need please? I think we've all agreed that the driver for energy policies and net zero by 2050, which can be met more quickly more cheaply through efficiency, decentralisation, localization and energy conservation, without resorting to nuclear powers Long live radioactive waste legacy to pass on to future generations, without the wholesale disruption that he suffered environment, and without 12 million tonnes of aggregate being transported across the country. In that respect, nuclear power is, as alluded to earlier an option rather than a necessity. If there was certainty about the need for nuclear Sure, we surely wouldn't be discussing it here. Could we remind ourselves that in 2005, in November, Tony Blair announced that nuclear power was back within with a vengeance in the face of predictions, the lights would go out and 2017. In the intervening 16 years since the Blair announcement, no new nuclear electricity was generated. 2017 came and went and the light stayed on. In fact, demand for electricity has been falling steadily and predictions for a 20% increase to 2020 turned into a fall of 16% in electricity demand. Because the renewable sources of electricity continues to fall, nuclear costs continue to rise, we face a climate emergency are asked to pay for the costs of building a plant, which will take 12 to 15 years to construct, at the end of which it will leave us with a carbon debt of millions of tonnes of co2 and which will have only a marginal impact on the need to drive down greenhouse gas production. investment in nuclear diverts filed away from renewables, which are deployable more quickly and which represent a much faster response to the climate emergency. We need climate action now, not in 15 years time. We cannot predict what the world will look like in 2035. But it's entirely possible that those technology technological advances continue to allow us to innovate, sizable sea will be redundant and surplus to requirements by 2035. or later. Can I just finish by saying that nowhere in the documentation mentioned this morning is sighs we'll see mentioned my name is no surprise to me at least that government wants to keep the word nuclear in the statement it makes about energy, the energy sector, as the UK has a huge investment in nuclear weapons and needs to ensure the supply chain and nuclear skills base is maintained. Thank you very much.

33:45

Thank you. So I'll try Rican Scott again. Now please. Okay, thank you. Although we do now, hello. Hello. Yes, thank you. Fine. Thank you. One moment, Mr. Wilkinson, if you could turn your camera off. Thank you. Right.

34:13

Trumpy very sharp. I wanted to make the point about urgency indeed, that I don't think anybody's mentioned. We will send in a document with detail about this. But Brexit has, in a strange way, re concentrated energy policy on on the UK as an island if you like isolated from Europe that the British government has been participating in the European energy policy for a long time. And in particular, very, very big innovatory hub with interconnectors to seven countries. The UK still got an option to that on the Northeast Dogger bank, which will itself relate to hydrogen and it raises several points that are quite simple. And possibly for the other items, the agenda. One of them is that should should size or C go ahead and other nuclear project. So I wanted to mention the three in North Wales the two at will for and the one at transmitted. should it go ahead and have an excess? Which is a question that is there in the climate change committee reports, the latest report saying that, towards 2050, it is likely nobody else has mentioned this, it is likely that nuclear big scale nuclear will have to go offline in hot summers. It's a very, very important consideration for a technology with a 60 to 80 year life. But back on the European option, that option would of course, be conditional on European competition policy. So it does raise a question about the funding of size we'll see should it for other reasons, you get to go ahead. Because the the ability to participate in these very, very large scale developments, which remove all questions of the lights going out, and the forecasts about the growing need for energy for electrical energy, all of those things have become quite minimal, should we decide to participate in this, which is just the first of four very large scale European projects. So urgency has been profoundly redefined by if you'd like a world region, energy market technology situation. The other point, the two points I want to make with that the the SMR strategy isn't now just an empty strategy. The there was a document published on the 29th of July, fronted by Mrs. Trevelyan the Minister of State I think. And that was the 29th of July. And a few days later, on August 17th, there was the publication of a significant document about a bad energy policy review. So government itself and are not poking fun in any sense, are very respectful of the government process. But government itself is talking with two voices all the time. And much of the rhetoric that seems to be being relied on by the developer is open to a lot of interpretation. And I mentioned yesterday that what is new nuclear was very, very clear two or three years ago, it is not at all clear now. And I doubt it would be the the definition of new nuclear as being solely big baseload nuclear would get through the court courts of law. The hydrogen point I think, is worth stressing again, because the hydrogen strategy has actually been published. And essentially, that has also changed the whole configuration of energy policy, because it's all to do with the linkage with another energy's energy supplies source to make hydrogen. And the government has in fact, got a detailed pilot programme. There are programmes, big programme is in the Humber using wind power to

38:23

when the when the wind is in excess, to produce hydrogen, which is very cheap to store. And by definition, that source for an otherwise expensive process would be at the point when the wind power on the grid is very, very cheap. So there is a new economic factor entering, which is not just the value for money for size, we'll see or the EPR as a design, but the value for money for linking to technologies, which are in the market. And the whole context, which again, nobody else is mentioned, is that while

Britain was in Europe, it was a participant very actively in the creation of an open competitive energy market. That strategy has not changed. That is still the core policy reference point. It's so that it means the SMC is, in a sense, simply a developer with a project in the marketplace. Thank you for listening.

39:22

Thank you. Right, I have a Stephen Thomas with this hand up.

39:35

Thank you. Thank you for giving me another opportunity and I want to address particularly the need whether there is an urgent need. And I would suggest that a much more reliable source of information on the need for new generation is the National Grid companies forecasts published last month rather than the Department of Energy, which is Pete Wilkinson said has a long history of hugely overestimating energy demand going back over 60 years, the National Grid company, of course, has responsibility for ensuring that the grid is stable. And it also has a responsibility for ensuring there is enough generating capacity. So I think their neck is on the line if they get it wrong, whereas base actually isn't. They have four scenarios, one of which fails to reach net zero by 2050. So we won't concern ourselves with that one. The other three scenarios all reach net zero in the electricity system, to in 2030, to one in 2034. So the electricity system will have reached net zero, before Sizewell C is completed. Two out of three of the scenarios do not include signs we'll see. So according to the National Grid company, there is no urgent need for nuclear power. And one other thing to state about the National Grid company scenarios is that nowhere does it talk about the need for reliable baseload power. And they're in their scenarios. There is no nuclear beyond Hinkley Point C. So it seems as if the National Grid company, the company responsible for the stability of the grid is not concerned about the lack of nuclear power. It's not concerned about the cost of storage, it has no concerns about batteries. So I think if we look at the National Grid companies, scenarios, and I would repeat that they are much more their reputation is much more on the line than pieces. I think it is clear there is no urgent need for size. We'll see. Thank you.

41:59

Thank you. Right. Mr. Parr, your hands up, but I have heard from you already. Can I just check if that was a short point you wanted to make? Or if that's a legacy hand?

42:18

No, it's not a legacy? Can I I hadn't realised that this type of agenda item was going to go quite excuse me quite so broad. No. And I asked my fault. I hesitate to read stuff that is beyond the inspectors remit. But in terms of need, I would add two things. First, that nuclear power, as we know, and what it generates controversy is it comes with a number of major strategic issues, such as waste and what to do with the waste, the risk of terrorism, security issues and so on. Now, climate change is an overwhelming priority and it has to be. So the question is Can Can one could one deliver on climate change commitments without incurring those strategic risks? And as I think many have outlined, you know, yes, you can. So, if you can do that, why would you want to go down the route that has all these risks associated with the second point is about opportunity cost, which is, as the controversies over the summer, about the costs of netzero has exemplified there is likely to be a limit to the extent to which the public are prepared to pay for measures that mitigate climate change. And therefore, if we are indulging

in things that are more expensive and cost the public more there is a risk to delivery of objectives. And there is also a risk with the bandwidth necessary to deliver those alternative solutions across a whole range of things not not simply on on on the electricity sector. And I would the said the risk of opportunity cost of going down a nuclear route, which is not cost or policy, optimal imperils net zero delivery doesn't help it. And I would point to the fact that last available count of civil servants in the in the Energy Department working on nuclear versus other things showed that there were more people into in base working on nuclear than they were on the combined policy areas of renewable energy and clean heat. Both of which are going to be absolutely central to delivering that zero, not peripheral sense. troll. And as his identity is contested by the applicant that the majority of power of energy, electricity is going to be delivered by renewables, and yet they are being underserved by civil servants compared to the numbers working on working on nuclear, which amounts to 207. And there are 199 working on on clean heat and renewables delivery. And so need for nuclear is in a wider context where it can actually be problematic for its delivery, not simply a component of the mix. Thank you.

45:37

Thank you. So final person to hand up is Nicola Pilkington. Good afternoon. Good afternoon. Can you hear me Miss icon? Yes, thank

45:55

you. I just had something very brief to add. I'm not sure whether it's already been mentioned. But basically, this adds to the discussion on whether nuclear is needed. So my argument would be that it's not actually needed. If we started a campaign of retrofitting houses now, as efficiently as some are COVID responses being done in the last year. So this retrofitting issue is really, really important. It's on all the emergency plans, it's on the East suffix response to climate emergency, and yet, nothing seems to be happening. So my argument is it if we retrofitted and also if community energy projects were made easier, by the bill that's currently making its way through Parliament, and supported by our wave, new MP, those two things could actually give us time to make further decisions on nuclear, and whether it was needed. The other benefit of community energy is the way it creates resilience in communities by bringing in money from the projects, and then allowing entities to decide how they're going to spend the money. So basically, I'm got my hand up the community energy, and retrofitting as a mix of alternatives.

47:51

thank thank you. Right. Thank you. I'll go now to the applicant for the response. Thank you, Madam, I'll try. We did cover quite a bit of ground that was perhaps not quite on that item. But hopefully, there's been a sort of a broad flow of thought as well. I don't need you to respond to the detail of all those points. We are going to cover modelling later on in any case, and also, Professor Thomas's initial points on on whether its size or C could meet the need. So if we could leave those points for later.

48:37

Thank you, Madam, I had intended to try and deal with what we've been listening to now over a considerable period of time in this Omnibus fashion, there are a couple of discrete points that are picked up. But I'll start with some general points, pick up a few discrete points, and then I'll see if Mr. Rhodes has anything to add. The first general point I'd make is that most of what we've been listening to, over the last period of time, has not been directed to the agenda item, as made me made very clear

what this agenda item is concerned with, is what national energy policies overall say about the scale and the urgency of the need. But what a lot of people have been addressing is not that question at all. They've been addressing the question of what should National Energy Policy say about the need for nuclear and just to take the most recent example, Miss Pilkington said, well, the points she wanted to add, go to the discussion of whether nuclear is needed. Of course, that's not up for debate. policy has said very clearly that nuclear is needed. That's not the point. Episode The agenda item, which is to explore what policy actually said it's also quite clearly not a matter which either the examining authority or the secretary of state could probably be expected to determine in response to an individual application for development consent, the process of identifying what is needed, having regard to a wide range of factors. modelling impacts, the relative benefits of different technologies, what sort of mix might be appropriate, whether it's right to set targets, all of those matters are for government through the policymaking process where there is an existing policy, they only come into play on a review process. And it's not appropriate. It's not realistic to expect those matters to be dealt with in parallel, in response to an individual application for development, consent. And the discussion reaches into questions of even how many civil servants are being deployed to consider different sorts of technology within the department that they're not matters that fall within the remit of this examination. It's not for this examination to consider different ways of meeting the need. For decarbonisation, that's a matter for government. That's a matter for policy. And similarly, it's not a matter for this examination to decide whether this is the least cost option, or at whether it represents value for money. And this is not simply independence and reliance on what is said in the MPs but also in the energy white paper pages 42 to 43, which made clear not only that the government is not targeting a particular generation mixer, nor would it be advisable to do so. But also this the electricity market should determine the best solutions for very low emissions and reliable suppliers at low cost to consumers. And the government's role it goes on to say is to ensure a market framework which promotes effective competition and delivers an affordable, secure and reliable system consistent with net zero emissions by 2050. And so that that's clear that, as I said before, the government has other means of delivering that. Nor is it appropriate to look to national grid, as though that is some sort of alternative policymaking body, not national grids role. It's not a policymaking body, it doesn't provide policy, nor is it

53:06

charged with that task under the planning app or otherwise, its job is not to identify how best to meet need, that's for the democratically accountable decision makers under the Act, and in this case, including the department criticisms of the department are criticisms of government policy. There was a question raised as to whether sizewell c four was within the scope of the policies, there's really no doubt about that. It's clear and one can look at it. I don't propose to take much time over it. But even if one simply looks at n six, and looks to see the scope of that policy in terms of the type of application for which it has effect in one mind, one has effect in relation to nuclear power generation with a capacity of more than 50 megawatts on a site listed within this NPS. So setting aside for the purposes of whether it has effect the issue of timing of deployment, in terms of the type of technology and the site, those matters are not seriously in doubt. The I'm going to ask Mr. Rhodes in a moment to deal with the extension of size. Well be noting that we are going to provide a written response to that in in response to your question g point two point 10. But I'll ask him to come in on that in a moment. The only other point that I was going to specifically cover because as I indicated most of what we be listening to has essentially be concerned with what the policy should be, rather than what it is, is just to comment briefly

on a point made by a Suffolk in relation to paragraph 3.2. Point three of em no one in the light of what the Court of Appeal has said, and I get to deal with this briefly, because I know we're going to come to it later. But it's important, I would suggest, to understand what the court of appeal was saying about this by looking not only at paragraph 65 of the Court of Appeals judgement, in particular, and obviously, what follows thereafter, but also the paragraphs to which it refers, and those are in in particular, earth, paragraph 314, and paragraph three to three. And if I can, if I can just ask your indulgence to just briefly explain what I mean by that. What the Court of Appeal was looking at was the meaning of the final two sentences a paragraph 323, which just for the benefit of those who don't have it, before them, this paragraph said this, the IPC should therefore give substantial weight to considerations of need. The weight, which is attributed to considerations and need in any given case, should be proportionate to the anticipated extent of the project's actual contribution to satisfying the need for a particular type of infrastructure. So that was controversial in that case, but what the Court of Appeal said was when those two sentences are read as continuing the thrust of the previous three, and in the wider context of the policies on need, taken together, their senses clear. The penultimate sentence looks back to what has just been said with a connecting word. Therefore, I just pause there, the first three sentences, the first one says, Well, this part of the MPs explains why the government considers it without significant amounts of new large scale energy infrastructure, the objectives of this energy and climate change policy cannot be fulfilled. However, as noted in Section 1.7, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. This part shows why the government considers that the need for such infrastructure will often be urgent.

57:35

Coming back for the Court of Appeal said it makes plain that the matters referred to in the first three sentences, which I've just read out, are the reasons why in decision making substantial weight should be given to considerations of need. And this is wholly consistent with what's already been said in paragraph 3112314. In particular 314 was what 314 says is the IPC should give substantial weight to the contribution which projects would make towards satisfying this need, when considering applications that are sent under the Planning Act 2008. Now we'll come on, I'm not ignoring the rest of what he said. But we'll come on to that under a separate agenda item. But when considering this question of balance, one needs to understand those paragraphs and how they work together. And the reasons why it The Court of Appeal identified the importance of the first three paragraphs in setting the context for the first we'll come back to this under item four. So, madam unless there's anything else, I was just gonna look to Mr. Rose to see if he I think he does have something further to add just to finalise our response. Thank you.

58:59

JOHN rode for the applicant, and just wanted to identify that the issues that we've heard of from interested parties now are issues of which the government has already seized. They don't represent a reason to change the government's position, they tend to reinforce the government's position. So one of the issues that was raised was hydrogen and hydrogen strategy that was published last week and suggested that that may be some sort of significant change. In fact, the hydrogen strategy published last week set out an aim to achieve five gigawatts of low carbon hydrogen by 2030. That's exactly the same aim that's reported in the energy white paper. And also reported in the in the government's 10 point plan. It's not new and the energy white paper Of course, set out at Lynx its support for hydrogen

as part of the future energy mix and set out a number of initiatives, including the intention to publish that I Hydrogen strategy. So the hydrogen strategy itself isn't a change, it's part of a consistent approach to recognising the need, we need, that we need a whole suite of different contributions in order to achieve the critical objective of net zero by 2050. In fact, the detail of hydrogen strategy explains the role of nuclear in relation to the hydrogen strategy. And we can set this out in more detail in the written submission following the hearing. But on page 10, it identifies that the energy white papers commitments to renewable generation and large scale nuclear mean that this low carbon electricity will be the primary route to decarbonisation for many parts of the energy system, including supporting the production of hydrogen. So it's part of the reinforcing of the importance of nuclear as part of the overall suite of energy solutions that are necessary, playing a particular role because of its particular characteristics. And equally, the position relation decides well, B doesn't represent any kind of change has been known for some time that there may be potential to extend the life of Sizewell B beyond 2025 and potentially beyond 2035. And we will respond to your question on this in writing. But the modelling you'll recall, identifies a need for in the central scenario 10 gigawatts of nuclear electricity by 2035. That can't be achieved, unless Sizewell B continues to generate electricity because it wouldn't be achieved simply through Sizewell C. Similarly, it was identified by two parties that small nuclear reactors have a promising role in forming part of the energy mix. And indeed, they may well do. But again, that's not news that something which is directly supported by the energy white paper. And the funding that was reported for research into that area comes directly from what is promised within the energy white paper as part of that overall strategy. And equally, the idea that it may be possible for electricity sector to decarbonize by 2035. Without Sizewell C, isn't news, there are potential alternatives in which that may be achieved, and scenarios that have been put forward by others to suggest that may be the case. But it's not just the energy sector that needs to decarbonize in every sector of the economy. And that's the reason why there's a forecast requirement reported in the energy white paper for a four fold increase in low carbon energy, in order that the energy sector can then help to decarbonize other sectors of the economy. And it was for that reason, you'll recall that the government rejected the recommendation of the national infrastructure commission. In November 2020, we went they had recommended, the government shouldn't agreed to support more than one nuclear power station beyond Hinkley Point C. And the government responded, and this is reported in the planning statement update at paragraph 2.1. Point 20. that things have moved on since that assessment was undertaken. In particular, the government's absolutely committed to net zero by 2050. Because of that the scale of low carbon energy generation that's necessary, requires a role for nuclear continuing and enhanced roles and nuclear as part of an energy mix.

1:03:58

So it may be that aspects of that appear to send different messages. I think it was suggested by one interested party that the government's talking with two voices, how can it be talking about hydrogen or small nuclear reactors, at the same time as its promoting policy support clear policy support for an urgent need for a large scale new nuclear power station? And the answer is because of the scale and urgency of the requirement which the government has identified. That's why nuclear has a role to play alongside other energy solutions. Thank you. Thank you.

1:04:46

Yeah, just check Mr. Phil pop that sums up pupil response.

1:04:50

Yes, my limit. your suggestion, I haven't sought to respond to each individual point. I've tried to deal with them, I hope fairly in that Omnibus manner.

1:05:00

Thank you. Right if we just make a start, at least on the next agenda item before we break for lunch. So that is the funding arrangements for the project. Now the examining authority has asked a number of first and second questions in relation to the funding arrangements for the project. And funding was also discussed at last week's compulsory acquisition hearing against the background of the compulsory acquisition guidance. Now, I will go first to Allison down, on behalf of stop signs we'll see. Because you have made written submissions to the effect that in the absence of an agreed funding mechanism for the project, the applicants claim of urgency is not reasonable. So we'll turn to you first on this. Thank you. Good afternoon, what I would say Before you begin, you have put in a paper, which is what would the route model mean for size, we'll see. That's yourself and Professor Thomas. So that is rep 2449. And that concludes that the electricity price for Rab funded signs we'll see would not offer value for money, and expresses concern that the government would accept what it believed to be the best deal available rather than walk away with no deal. But if I would just point out that the question of whether the Rab model would represent value for money, and whether funding should proceed on that basis, those are decisions for the government, and not for the examining authority. So what I want you to focus on in addressing me now is the concern, which is the examination. And that's on the timing implicant in pink implications that implementation might have for the commencement of development for so that's really what I would like to concentrate on.

1:07:18

Thank you. Miss MCI? Yes, indeed. And with your permission, I may ask Professor Thomas, if he wants to add anything to these remarks. And I listened to the compulsory acquisition hearing last week and heard the questions that you asked the applicant about the timing. And, and in particular, I heard the applicant Express very strong levels of confidence that a decision would be made on whether or not the Rab model would be used within the timeframe of the examination. And now, this might be a point of clarification. But it did surprise me given that the statutory period of the examination runs to the 14th of October. And you know that that's a very short timeframe, indeed. And it also raised the question in my mind about whether an in principle decision by the government that the Rab model was, you know, should be put forward, you know, was the same as the rat model, and all the appropriate kind of legal instrumentation or legislation, if that's what's required, being drawn up, would actually be done so within an acceptable timeframe that would meet the applicants timescale for the project. So those seem to me to be very ambitious. And I was also interested to hear the applicant state that they weren't able to comment on the timeframes for any alternatives or indeed what any specific alternatives might be, because I think I heard the word contract contract for difference mentioned, but I think it is widely understood that a contract contract for difference approach, you know, would not be repeated after the very strong criticisms by the National Audit Office of what happened with the Hinkley Point C. Deal. So it was a question really, you know, for the applicant to to elaborate on on this confident level of confidence about the timescale for a decision being made on ramp, and then subsequently, you know, the the appropriate framework for that to be actually applied. And also, secondly, a question that you

asked in the compulsory acquisition hearing, which the applicant said it didn't anticipate and wasn't able to answer, which was an explanation for why in the most recent EDF financial report published for the January to June period, there was a statement saying that there were discussions with the government and taking place or or planned about additional funding being made available up to the final investment decision. I know that you you ask questions too about the dates in that financial report for the final investment decision, which at the end of last year said that was anticipated in their budget prior to this most recent Stanton says and 2220 2022, early 2023. And I do observe in the implementation plan, you know, that some work is, is down as as being commenced before the end of 2022. And and you asked that question, but the applicant, you know, reiterated that that was their expectation to remain on schedule. So those were my questions, but could I just ask if Professor Thomas wanted to make any additional points at this stage that he'd be allowed to do? So?

1:10:30

Yes, thank you. Yeah, yes, I hope you can hear me now. The only thing I'd like to add on timing is looking back at the Thames tideway project, which is often portrayed as the model of the the size we'll see funding model has been developed from, I noticed, there was a government document published in 2015, when the contracts were signed for the Thames tideway. And it said, over the past five years, Defra legal advisors, along with the commercial law group, and colleagues in mitigation, have negotiated away through many of the obstacles that threatened the project. They've also developed a novel and unique legislative and regulatory firm framework, which underpins the model. Now, the size we'll see project is certainly far more complex of project than Thames tideway. Not to mention it costs five or six times as much money. I've seen no evidence that that that legal and regulatory work has been even started yet. So I think in terms of funding, it's, we're a long way away from the point where the government would be in a position to sign a deal with the with the with the finances of the project. Thank you.

1:12:05

Thank you. Right, I'm just checking if there was anyone else that wanted to speak on this topic. It may be my hands that functions not working. Can't see anyone, I'll just check with my case, team. mykhailo hands up from all right. So what I'm gonna do, I'm just going to, because we're nearly coming up to lunchtime, but I've just asked my colleague, Mr. Brock to take over because I'm having some difficulties here with my screen. So if I can get Mr. Brock just to take over and hear from Regan Scott on this. Hello, Mr. Scott.

1:13:06

Hello. Thank you, trying to stick to the wrap timing problem. It's well understood that I think Governor Tom record but it's been understood since the Brussels inquiry into HBC that it would require primary legislation because of the fundamental problem which didn't affect Thames water, where I once was a customer of Thames water who had a natural monopoly, and were in a position to impose a levy on their consumers. The The problem here is that consumers already have a have an ability not to buy nuclear electricity. I'm one of those consumers, I buy renewable electricity. That's the reason I think that primary religious legislation is required, aside from many other problems as to whether Rab would be an overall levee system for the nuclear sector, or, or more broadly, for energy. And I think that is certainly going to take time legislative time. There's a second aspect to that, which is the government

has, of course announced an exploration and consultation about a levy for the gas industry, which will be partly about conversion to hydrogen. And the other constraint is the reflects, if you like, competition principles, but the competition and markets authority have recently reinforced off Jen with respect to the rate of return that would be expected from all electricity suppliers or in fact, energy suppliers in future and it's actually quite low. It's 4.3 heavy wants to find it. 4.3% return on what The National either annual income or on capital employed, whatever that is half of the rate that Hinkley Point C had. And the point I want to raise, it's a matter of economics. And there are much better economists than I am who can look at this. But if you impute a high risk factor to anyone investing in the project, that risk factor could be of the order of say, 2% out of 4.3, which leaves really a reliable return of only 2%. For long term investors in the project, and I think sorting that one out is going to take a long, long time in the investment community. So the notion that an F ID, you know, can be decided, I think the wording of any announcement about it the interesting to scrutinise. But the notion that F ID is going to be a quite a quick process is really just not tenable. Thank you.

1:15:59

Thank you, Mr. Scott. I've got Miss. I see Mr. Wilson, the task your your hand is up.

1:16:11

Thank you, Mr. Brock. Yes, Chris Wilson on behalf of task. And I just wanted to add some further points. From what Hudson downs were saying with regard to the timing of financing, or to listen to the compulsory issue hearings and heard the clients speaking about their confidence in obtaining the funding. And when you compare that with their financial statements, and the comments that are made in those, and it makes you realise that there's quite a variance that may well be because in the financial statements, they have a legal obligation to not make misleading misleading claims for practice previously fined about 50 million euros for misleading the market over the HPC deal. So I think there are a lot more selective in what they put in writing in their annual statements. And just a couple of them, one of them basically, refers acknowledges that the objective for sizeable C is to obtain third party investors. And basically, it says, without an appropriate risk sharing mechanism and financing structure, that won't be possible that the accounts actually say at this stage, it's not clear that the group will achieve this objective. So they're obviously casting doubt over the ability to to to obtain that third party investment. They then go on to say that the FA fid may be dependent on operational controller Hinckley, obviously Hinkley has been delayed. So when when that control will actually happen, must be in doubt. And they actually acknowledge that they say this in the accounts, none of the three conditions they list are currently assured. And that, to my mind, that puts a lot more doubt in my mind as to the ability of the applicant to have sufficient funds for this project, and especially in the timescale that they seem to be implying that they will have it. Thank you.

1:18:14

Thank you. For accounting, Mr. Rawls, whose hand I see is up. Can I just ask, are there any other interested parties who wish to make submissions of this particular agenda item? Okay, that is a no in that case, we will we're coming up to one o'clock. I'm going to ask Mr. Rules, if you would make your submissions and then we will adjourn for lunch. And I will ask the applicant or possibly this MCI will ask the applicant to make its response. Mr. Rawls,

1:18:57

thank you. I'm slightly naive question possibly, but given the importance of fighting climate change in light, and given that a government's primary objective must be to protect its citizens. And given that they seem to believe that nuclear power is a key way of achieving that. I'm just wondering why they feel the need to go through quite a complex financial procedure, the regulated acid base model to to fund new nuclear Shouldn't they just be paying that from central government funds? You'd be like I mentioned they'd basically be putting their money where their opinions are, it does seem an incredibly long winded way. We've got high political and economic risk of our funding what they consider to be something which not to put too fine a point on it could be essential to the survival of the country as we know it. Allah. Okay, thank you.

1:19:50

Thank you, Mr. rolls. Thank you. Quick, they will we have got to one o'clock now I see that in fact, Miss Mikheil back Because my intention that we now adjourn for lunch is where at one o'clock would you like us to adjourn for 45 minutes or for half an hour 45 minutes please. Record. We will adjourn now in that case and we will come back at a cost to thank you. We are now adjourned.