



NGO Forum – 9th December 2024

Date: Monday 9th Dec
 Location: Hybrid meeting, with the Minister meeting some NGO members in-person at 55 Whitehall.
 Chair: Chris Heffer (CH) & Alison Downes (AD)

NGO Forum Attendees who raised questions to the Minister:

Alison Downes – Stop Sizewell C

Stephen Thomas - Emeritus Professor of Energy Policy, University of Greenwich [Guest for this meeting]

Andy Blowers – Emeritus Professor of Social Sciences, Open University, and Blackwater Against New Nuclear Group (BANNG)

Paul Collins – Chair for Stop Sizewell C

Chris Wilson – Together Against Sizewell C (TASC)

Katy Attwater - Stop Hinkley

Jo Smoldon - Stop Hinkley

Ian Ralls – Friends of the Earth Nuclear Network [Attended online]

Lord Hunt Minister of State for Energy Security

DESNZ Senior Officials

Chris Heffer, Director Nuclear Power Infrastructure, Capability & Decommissioning

Sam White, Deputy Director Power & Industry,

Phil Haslam, Deputy Director SZC Finance,

Grant Evans, Deputy Director SZC Technical

Agenda:

Item	Topic
	Arrivals & Welcomes
1	Outstanding Matters from the Previous Meeting



2	Ministerial Engagement – Lord Hunt Lord Hunt to take questions from the NGO members
3	Sizewell C
4	Wider Nuclear Issues <ul style="list-style-type: none">● Green Taxonomy● Siting● Clean Power by 2030: https://www.gov.uk/government/publications/clean-power-2030-action-plan
	AOB & Meeting Close

Papers submitted in advance:

- For Item 2: [Time to call time on GB nuclear fantasy, Sept.,'24 AB ST.pdf](#)

Minutes:

1. Matters arising from the previous meeting

Two areas were considered outstanding:

- a) **Green Taxonomy** – this will be addressed later in the meeting
- b) **Nuclear Civil-Defence Relationship** – Officials acknowledged receipt of the paper received on this. NGO members were given the opportunity to put questions to the lead official on this, at the meeting, but members didn't have any. A request was also made for a separate meeting on this involving DESNZ, MOD, & Forum members and external academics, but officials were not minded to arrange this at this time.

2. Questions for Lord Hunt

Minister Hunt welcomed the opportunity to meet the NGO members again, following his first meeting with them in July 2024. He then gave the floor to all those present in the room to introduce themselves, before beginning to take questions.

Questions had been submitted in advance; although not all questions were asked in the meeting, responses to all are noted below.



Ministerial Engagement – Lord Hunt

Q. Given your department considers that it is possible to achieve a net zero grid by 2030 with a minimal nuclear contribution, and given the cost of and constraints on new nuclear as Steve and Andy will elaborate, why do you consider it necessary to expand nuclear beyond 5GW?

A. There is broad consensus that reliable low-carbon power, such as nuclear, is needed alongside wind and solar generation to provide constantly generating baseload power. As one of the most reliable, secure, low-carbon sources of electricity, nuclear power is and will continue to be an essential part of our journey to net zero by 2050.

Q. Whilst we accept that you have no stated nuclear generation target, what is your provisional target, so that the multi-year Spending Review can assess whether it would be affordable? What estimate has HMG made of the financial commitment that would be necessary for the government to implement the nuclear plan you have in mind? Does your government acknowledge that 24GW as a target is unrealistic and unaffordable? If not, why not?

A. The Government is continuing to carefully examine the legacy left by the previous government and so it is premature to comment on the financial commitments of our long-term nuclear plan at this stage. As an immediate priority, the Government is working to get Hinkley Point C over the line and to ensure that new nuclear power stations, such as Sizewell C and small modular reactors (SMRs), play an important role in helping achieve energy security and clean power.

There is also a global appetite at the moment for Advanced Modular and Small Modular reactors – e.g. to power data centres for AI.

Q. Which, if any, aspects of the last government’s nuclear roadmap do you subscribe to, for example key dates for major decisions such as FID on follow-on two large reactor stations in 2029 and 2030 and FID for four SMRs in 2029 - or do you intend to produce your own roadmap?

A. The Government is continuing to examine the legacy left by the previous Government. As announced at the Autumn Budget, Great British Nuclear’s Small Modular Reactor competition has entered the negotiation phase with shortlisted vendors, with final decisions to be taken in the spring, and £2.7bn of funding has been allocated to support Sizewell C’s development in the next fiscal year, with a Final Investment Decision on whether to proceed with the project to be taken at Phase 2 of the Spending Review.



Q. Can the Minister guarantee there the government will not put pressure of any kind on the ONR to extend the lives of any AGR reactors?

A. The Government is not directly involved in the decision-making process to extend the operating lifetime of any nuclear power stations. EDF make the decision for extensions on a safety and commercial basis. The ONR is the independent nuclear regulator and will not allow any facility to operate unless they are satisfied that it is safe to do so.

The Minister also confirmed that he would put no external pressure on ONR to do so.

Finance – led by Prof Steve Thomas

Q. The market will determine what rate of return it is prepared to accept if it is to invest in Sizewell C and the market will set that rate based on the level of risk it is required to take. So, the benefit to consumers of shouldering less project risk will be offset by them having to pay a higher rate of return during construction and during the operation of the plant. How will the government determine the balance of risk being imposed on investors and on minimising the rate of return consumers have to pay investors?

A.

- By sharing risk and charging in construction, the RAB model can bring in new types of finance at a lower cost of capital, alongside the benefits of a public private partnership.
- The balance of risk will be implemented through the project's economic licence, which has developed through market testing, a statutory consultation (including with consumer groups), and investor negotiations.
- Any decision to take FID is subject to all relevant HMG approvals, in line with HM Treasury's Green Book guidance.
- The licence will be consistent with the broader subsidy control regime, meaning it must be the minimum intervention necessary to achieve the policy goal.

Q. Is there a maximum percentage stake the government is prepared to take in the company that will own Sizewell C for a RAB-organised Sizewell C deal and is it essential for a FID that EDF takes its possible 19.99% stake in the deal?

A. Details of the capital structure for SZC are subject to ongoing and commercially sensitive negotiations. I cannot comment further.

Q. We know that, unlike Hinkley Point C, where the price paid for power was set at the time of FID, the price of power from Sizewell C will vary from year to year. It will depend mainly on the rate of return allowed to the owners of the plant, the actual construction cost, the operating cost and the forecast decommissioning cost. In order for a VfM to be



undertaken in advance of the FID, a forecast of the cost of power will have to be made in order to compare it with the alternative policies. Will government publish this projected power price for power from Sizewell C along with the assumptions underlying it when it takes a Final Investment Decision. Will there be a maximum forecast power price for any Sizewell C deal beyond which a deal will not be done, corresponding to the maximum prices specified in the renewables Allocation Rounds?

A.

- The value for money assessment for the SZC project compares the cost of an electricity system with SZC to the cost of an electricity system with alternative forms of low carbon generation.
- An assessment was published at the project's designation for a RAB and a further assessment will be published around the time of FID.
- In line with HMT's Green Book guidance, this will sensitivity test the analysis, considering the possibility of cost and schedule overrun and its impact on project value for money.
- Comparing technology levelised costs / strike prices isn't necessarily comparing like for like.
- Looking at whole system costs are important to capture the benefits which nuclear generation can bring to the energy system, for example, in terms of lower network costs compared to some forms of renewable generation.

Q. Has HMG ruled out taking a stake in Hinkley Point C?

A. Hinkley Point C is not a government project, and its financing is a matter for the project's current shareholders.

Constraints/Siting – led by Prof Andy Blowers

Q. Do you accept that the sites carried forward from EN-6 are only 'potentially suitable' and will you confirm that there are no suitable sites readily available now for development?

A.

EN-6 listed eight named sites that it concluded were potentially suitable for the development of GW-scale nuclear infrastructure by 2025, based on a Strategic Siting Assessment. Developers are still required to secure a Development Consent Order before development can commence at those sites.

The sites listed in EN-6 will still have advantages which make them attractive to nuclear developers, including potentially a skilled local workforce, access to cooling water, connectivity to transmission networks and the availability of appropriately large sites.



Q. Will government guarantee that any site owned or brought forward by prospective developers will be subject to the full panoply of regulatory and planning constraints and controls?

A.

The UK has an enabling, robust and rigorous nuclear regulatory regime overseen by the UK's independent regulators, Office for Nuclear Regulation and the relevant environmental regulator. The Government works closely with the nuclear regulators to respond to developing new nuclear technologies, whilst upholding regulatory, security and safety standards.

Q. Will Government declare that there is no intention to delegate site selection to developers thereby by-passing the democratic processes?

A.

EN-7 is not yet finalised, and we plan to consult on the draft text in 2025. We encourage you to respond.

Q. How will government ensure that any proposals to speed up the planning process do not compromise legitimate democratic processes?

A.

Section 47 of the Planning Act 2008 (Planning Regs 2008) sets out the duty to undergo public consultation and the government does not intend to diminish these requirements when pursuing proposals to speed up the planning processes.

The Minister concluded this section of the meeting by expressing that he does not use the terms 'NIMBYs' or 'Blockers' and does not consider the NGO members these, finding their engagement professional and helpful.

Part 2: Sizewell C - led by Stop Sizewell C and TASC (Paul and Chris)

Q. Does the Minister accept that Sizewell C is currently proceeding by stealth, with no transparency about its cost, value for money, expected completion date, allowed rate of return and size of surcharge on public bills, despite the allocation of £5.2bn of public money. This is exacerbated by the decision by officials to adopt a "revised approach" to engagement, essentially shutting down bilateral meetings about Sizewell C and other energy related projects in the area.

a. What steps does the Minister propose to take to address this lack of transparency?

A.

- It is important that during commercially sensitive negotiations information is not disclosed that could undermine the government and the project's efforts to get the best deal possible for consumers and taxpayers.
- We have committed to publishing a VFM assessment at the point of entering a revenue collection contract for the project.



- Lord Hunt and officials are looking at NGO requests for further engagement outside the Forum and will report back to the co-chair in due course.
- Any money given to the project is given following normal governance policies and procedures.

Q.

b. (Paul Collins), Town and Parish Councils are very concerned about the cumulative impact of Sizewell C, Scottish Power wind farms, two proposed National Grid interconnectors and two speculative large solar arrays, all scheduled to be sited in and around the same area and reliant upon the existing high voltage network and proposed Friston substation. Despite attempts to engage with ministers and DESNZ, progress towards any meaningful dialogue has gone into reverse rather than continuing to move forward and there is no opportunity to discuss cumulative impact in the Sizewell C Forums as neither Scottish Power or National Grid are in attendance. Will the minister help to move this forward once again recognising the significant impacts that are proposed for East Suffolk and the coastal area?

A.

- We fully acknowledge the potential cumulative impacts of multiple electricity infrastructure projects in the East of England, and that this is an important and significant issue for local residents.
- We know that SZC Ltd has invited and continues to invite other projects to attend its local forums. Officials are also engaged in meetings arranged by the Local Authorities, which bring the major projects together to discuss developments and overlapping issues and challenges, and with policy leads for other relevant areas (such as electricity networks).

Q. In the light of Simon Bowen's evidence at the ESNZ Committee on 20th Nov, and in recognition that the Sizewell C project is literally digging a significant number of large holes throughout East Suffolk, devastating the environment and AONB landscape in the process, without a final design of the all-important sea defences and the nuclear site's ground stabilisation trials being incomplete, does the Minister agree that the Sizewell C project has not followed Simon Bowen's advice as it has not been 'de-risked' and will therefore struggle to provide true value for money and this is one of the reasons why third-party investment has been so hard to find?

A.

- We do not share your interpretation of Simon Bowen's first answer, which was given in response to a broader line of questioning relating to the approvals process for both HPC and SZC.
- Simon Bowen said in other parts of his evidence that SZC "will learn an enormous amount" from HPC and other EPR projects and I can confirm that this is already the case.



- Hinkley Point C was a first of a kind project in the UK. We expect the design for SZC for be more mature at the point of its Final Investment Decision, meaning that there will be fewer 'unknowns' with respect to its design.
- The SZC Co project team has worked closely with teams at HPC in developing SZC's schedule, cost and risk estimates.
- I would not accept either that third-party investment is difficult to find – the ongoing equity raise demonstrates that there is appetite amongst potential investors to invest in Sizewell C and new nuclear projects more generally.
- HMG has robust governance process and involves external organisations, such as the IPA, to assist with decision making.

Q. Is the SZC equity raise process being re-opened to new investors? We note a story in the Financial Times concerning a future visit to the Middle East by the PM which mentions Saudi Arabia as a possible source for investment as well as UAE?

A.

- As confirmed at the Budget, the equity and debt raise process is shortly entering its final stages.
- As the process is commercially sensitive I cannot comment further.

Q. Given the pollution generated from the mining, milling, fabrication and enrichment to produce the nuclear fuel; the emissions to air and water from an operational Sizewell C, including the thousands of tonnes of dead fish, heavy metals, chlorine and the cocktail of other pollutants that will be discharged to the North Sea annually from the plant's cooling water system, and the nearly 4,000 tonnes legacy of highly radioactive spent fuel and other radioactive waste which will be an environmental, as well as financial, burden for future generations for thousands of years, **could the Minister please explain how Sizewell C's electricity can be legitimately described as 'clean'?**

A.

- Nuclear electricity results in no CO2 emissions at the point of generation.
- Authorities such as the UN Economic Commission for Europe – in their Integrated Life-cycle Assessment of Electricity Sources – have assessed that most life cycle impact indicators for nuclear energy were low – in many cases lower than for renewables. Impact indicators where nuclear energy had a higher potential impact than renewables were water use and ionising radiation, which the UK effectively manages through regulation.

Part 3 – other questions

Q. Hinkley Point C. Stop Hinkley previously informed Minister Hunt about EDF trying to remove the Acoustic Fish Deterrent (AFD) from their DCO for HPC. Is he aware that EDF is now bullying local coastal communities around the Severn Estuary with threats of compulsory purchase orders to turn their farmland and homes into Salt Marshes? This is to compensate for not installing the AFD they signed up to in their DCO. Will the



Minister keep the SoS for DESNZ informed that he will have to make a decision in 2025, after a PINS Public Enquiry, on EDF's second application in 4 years to remove the AFD from the DCO for HPC? After their first application and Public Enquiry they were told by the then SoS in 2023 that they had to install the AFD. [Stop Hinkley will hand over a report explaining how EDF can easily install an AFD at HPC.] Once the Minister has read it will he ensure the SoS receives a copy?"

A.

As a DESNZ Minister I cannot enter into a discussion on this area. This will be a quasi-judicial decision to be taken by a DESNZ Minister under the 2008 Planning Act.

Q. Can the Minister outline the technical and financial benefits of the Advanced Modular Reactors, mentioned in your letter to Profs Thomas and Blowers, over existing designs and how close to regulatory approval any of the proposed designs are?

A.

We recognise that modular manufacturing in the field of nuclear energy could be a transformative leap for the sector. Due to their size, modularity, and replicability, Advanced Nuclear Technologies have the potential to scale quickly through factory-based supply chains and offsite construction, as well as the potential to reduce costs through replication learning.

Additionally, through the use of novel coolants, fuels and passive safety systems, AMRs have the potential to improve thermal efficiency and generate higher temperatures.

Note: At this point, Minister Hunt left the meeting, as per agreed timetable.

3. Sizewell C

Various topics were raised, as below.

- On taxonomy, a question was raised as to whether nuclear can legitimately be called green. See Point 4 for further discussion.
- NGOs questioned EDF's role in the SZC negotiations, and suggested they are undertaking briefing (which would be outside of their remit as an investor). Officials reassured NGOs that HMG is leading the process, through its own advisory team and reiterated that HMG sets the terms of the RAB licence and is leading that conversation.
- NGOs queried the project costs that were being incurred before the Final Investment Decision. The figures were clarified. Officials reiterated HMG's commitment to publish a value for money assessment at the point of FID.
- NGOs requested the output HMG have predicted for Sizewell C in megawatt hours over the course of its 35-year lifetime, accounting for outages, etc. Officials directed them to Minister Shanks' PQ response, but NGOs were unsatisfied with the explanation that the commercial output of Hinkley Point C is commercially sensitive. Officials suggested that



it is likely to be the factors that go into calculating this figure, such as the discount rate, that are commercially sensitive.

- The RAB savings figures available date back to the previous Government's term, and were produced to support the process of a Parliamentary Bill which has long since passed and become an act. There are no plans to update these and it is not possible to undertake the a cost assessment of a RAB vs a CFD for Sizewell C at this stage, as there is no worked up CFD model.

4. Wider Nuclear Issues

4a. Green Taxonomy.

The current HMT-led consultation opened on 14 November and runs until 6 February 2025. It was noted that nuclear is included in the EU Green Taxonomy and that this is of key interest to investors. Responses and contributions were encouraged from attendees.

Members raised the definition of the term 'clean' in reference Nuclear. They were advised to write into the department again to get the government's position on this.

4b. Siting: Department confirmed that a response to the siting consultation run by the previous Government will be published in 2025 alongside a draft of the new National Policy Statement on nuclear (EN-7).

4c. Clean Power 2030.

Officials were asked to comment on the proposed extension of Torness to 2030, in particular whether the new Freeport slated for the Murray Firth could result in the pause of UK powers to assemble nuclear power infrastructure in Scotland for use elsewhere.

Officials stated that HMG has no plans to rescind Scottish planning powers that they're aware of.

5. AOB and Close

Officials promised to respond to a question asked in the meeting Teams chat separately. The question and response are noted below:

Question: Concerning the matter of nuclear waste disposal; Under the 2018 Working with Communities Legislation, Local Authorities engaged with Community Partnerships have an obligation to take tests of public support from time to time. As far as I'm aware no tests of public support have hitherto been undertaken. Can the minister advise as to when tests of public support will be undertaken concerning the siting of a Deep Geological Repository?

Response: First, just to clarify the Working with Communities policy is not legislative and there is no obligation on local authorities to take tests of public support from time to time.



Minutes

The policy does, however, stipulate that before the developer, Nuclear Waste Services (NWS), seeks regulatory approval and development consent to begin construction of a GDF in a particular community, there must be a Test of Public Support of residents in the Potential Host Community to determine whether the community is willing to host a GDF.

Under the policy it is the relevant principal local authorities on the Community Partnership that take the decision on if or when to hold a Test of Public Support. In order to move to a Test of Public Support all relevant principal local authorities on the Community Partnership must agree.

The Test of Public Support would only be taken after extensive community engagement when the community has had time to ask questions, raise any concerns and learn about a GDF. There will be only one opportunity for a Test of Public Support in each Potential Host Community. However, the UK Government expects the Community Partnership to monitor public opinion throughout the process.

ENDS