

NGO Forum – 13th May 2026 Time: 15:30 – 17:00

Location: Hybrid: DESNZ Head office – 3-5 Whitehall Place and online

Co-Chairs: Chris Heffer (DESNZ) & Alison Downes (NGO member)

DESNZ Senior Officials:

Chris Heffer

Jon Sutton

Sam White

Katrina McLeay

Dawn Armstrong

Michael Lindsay

Adetola Aderogba

Ellie Perkins

DEFRA: Sarah Swash

Environment Agency: Alan McGregor

NGO Members:

Alison Downes Stop Sizewell C

Jenny Kirtley TASC

Chris Wilson TASC

Andy Blowers BANNG

Doug Parr Greenpeace

Ian Ralls FOE Nuclear Network

Sue Aubery Stop Hinkley

Colin Wales Cumbria Trust

Apologies: Tor Justad Highlands Against Nuclear

AGENDA

1. NGO Forum Topics

2. Fingleton Review

3. GDF

4. SZC Business Case

1. NGO FORUM TOPICS

NGO members set out their objections to DESNZ's recent decision to exclude items from the NGO Forum that are considered 'settled policy matters'. They highlighted their view that NGO members add value in providing scrutiny on projects and policy decisions, even after the government has taken a final decision on them.

DESNZ officials set out that DESNZ and Ministers are also open to challenge on its policies and projects and that there are various official channels to do this through. For example:

- Written correspondence to the department and/or Minister
- Raising a matter via your local MP
- Responding to public Consultations

On the matter of project/policies that are now considered settled, DESNZ explained that plenty of time had been given to these subjects over the years, while the government was considering the projects and policies were being debated and formed. But it was now right to move on from debating these in the forum, once the government had made a 'Final investment Decision' (as is the case with Sizewell C) and/or relevant legislation had gone through assent (as is the case with the National Policy Statement).

Alison expressed the hope that if NGOs wished to discuss a subject and provided reasonable justification for doing so, DESNZ would remain open to including such items on the agenda on a case-by-case basis in the future.

On Sizewell C specifically:

How does DESNZ justify the exclusion of certain aspects of the Sizewell C project from the NGO forum?

Following Sizewell C financial close, it is important for us to reflect that SZC Ltd has been empowered to act as an independent commercial entity in which government is a shareholder.

This has implications for how we as a department interact with the project. DESNZ holds the government's shareholding function, which provides support to HMG's board directors for them to represent HMG interests in board discussions, and to discharge their fiduciary responsibilities to the company, and a policy sponsor function. This will maintain an ongoing relationship with SZC Ltd, to ensure alignment with wider HMG policy, and provide support if appropriate to facilitate project progress.

We are open to questions on the SZC as they relate to our role as policy sponsors (e.g. publications relating to SZC, like the recent Summary Business Case and the department's future annual project updates), but it is SZC Ltd that is responsible for the project's delivery and its outcomes. The company should be the primary point of contact for queries on SZC's progress in construction, plans for operation etc.

NGOs pointed out that, unlike another independent commercial entity, Hinkley C, they are excluded from the Sizewell C community forums.

2. NUCLEAR REGULATORY (FINGLETON) REVIEW (and Planning Act)

a) Nature recovery

The proposals for developers to contribute to a nature recovery fund, rather than mitigate the damage they cause directly, will result in nature enrichment taking place many miles from where damage is done. **What assurances can DESNZ provide that this will not result in internationally recognised nature-rich environments - such as those in East Suffolk whose economy is inextricably linked to eco-tourism - will not be permanently degraded?**

The Nature Restoration Fund (NRF) will deliver more for nature, not less, and a number of robust safeguards are in place to ensure this.

The Overall Improvement Test is the central protection. An Environmental Delivery Plan (EDP) can only be approved by the Secretary of State where the effect of conservation measures will materially outweigh the negative effects of development on the relevant environmental feature. EDPs and the conservation measures they propose will be evidence-based and properly scrutinised before being put in place and must include back-up measures that will be deployed during the life of the EDP if monitoring shows the environmental outcomes are not being achieved.

On the specific concern about conservation measures being delivered far from the site of impact, the legislation is clear that network measures (i.e. measures taken elsewhere in the site network rather than at the affected site) can only be included in an EDP where Natural England considers they deliver greater conservation benefits than on-site action. Where network measures are included, Natural England must include a statement in the EDP explaining how that test is met.

Communities and stakeholders, including those in environmentally sensitive areas like East Suffolk, would also have the opportunity to engage through a mandatory minimum 28 working-day public consultation on all draft EDPs before they are made.

b) Safety and Radiation (ALARP)

i) The Regulatory Review recommended more alignment with international regulators. Which nuclear nation's safety standards will the UK NOT be guided by?

The UK will continue to align with the high safety standards set by the IAEA. The UK plays a key role in influencing these standards as they are developed in the safety standard committees.

The UK has a very mature regulatory framework which is recognised internationally with other member states looking to the UK for guidance.

ii) What assurances can DESNZ provide about the risk that the dilution of US standards across all nuclear technology poses to UK nuclear safety standards? For example, Sizewell B relies on US dry storage casks for spent fuel - what assessment of the reduced US standards will be undertaken?

The UK's independent regulator will assess UK arrangements to ensure that arrangements meet UK law and that risks are reduced so far as is reasonably practicable.

iii) In the context of radiation levels, how does the government define the word "proportionate"? What allowances have been made for the fact that women are more radiation sensitive than men?

There isn't currently a definition for proportionality. This is reflected in Recommendation 8 of the Fingleton Review which recommends that there should be a 'proportionality' definition in regulation under the Health and Safety at Work Act. This is an area we are working with the Department for Business and Trade to understand how this will impact other sectors outside of nuclear.

On radiation levels more generally, UK regulations will continue to align with international best practice. The dose limits for members of the public are: 1 mSv per year effective dose, 15 mSv per year dose to the lens of the eye and 50 mSv per year dose to the skin

c) Siting/Planning

i) Given the government did not accept the recommendation relating to the semi-urban population density criteria, saying it planned to "go further", what is the justification for this intention and what is the timescale and process - including whether it will involve public consultations - for implementing whatever is finally decided?

The Taskforce recommendation suggested creating two possible routes for Light Water Reactors either compliance with the methodology or a 28-day discretionary process.

We felt that this added unnecessary ambiguity and complexity to the process for Light Water Reactor vendors only, so instead we are revising the criterion for all types of nuclear reactor.

Any updates to EN-7, including a revised population density criterion, will be subject to public consultation and parliamentary scrutiny. On our current timelines we are hoping to publish the revised EN-7 before the end of the year for consultation.

ii) What is the timetable and process to prepare “best practice” guidance to developers on DCO public consultations?

As set out in MHCLGs "Streamlining Infrastructure Planning: Implementation Plan" published in March, MHCLG will be publishing new guidance to developers on pre-application, acceptance and content of a DCO application shortly.

<https://www.gov.uk/government/publications/streamlining-infrastructure-planning-implementation-plan...>

When does DESNZ expect to have the new Discharge of Requirements unit operational?

DESNZ's planning delivery team is currently establishing the new post-consent unit. This will be a new team within the existing energy infrastructure planning delivery function in DESNZ and will lead with the determination of applications from developers for the discharge of post-consent requirements. It will initially apply to electricity network (overhead power line) and nuclear DCOs. Recruitment of the team is progressing, and we expect the new Unit to be in operation by the end of this year.

NGOs sought and were given assurances that the following points of concern about the sidelining of local authorities had been conveyed to the relevant policy team.

iv) Isn't there a conflict of interest when DESNZ is both a promoter, and in SZC's case an investor and major shareholder, of these projects and the DESNZ unit will become the authority for approving Discharges of Requirements for those projects it is itself promoting?

Under the planning system set out in the 2008 Planning Act, Nationally Significant energy Infrastructure applications are decided by DESNZ, and those for transport by the Department for Transport. Both departments already discharge some post-consent requirements; DESNZ for matters such as habitats compensation plans and financial guarantees for energy projects. DfT has a Unit in place to discharge requirements for National Highways DCOs. It is recognised that those departments also lead on energy and transport policy respectively, and the planning system recognises the necessity for functional separation between teams who consent applications or discharge post-consent requirements and those that lead with policy or work directly with developers. This is achieved through strict adherence with government guidance on planning propriety.

Does DESNZ and the Government appreciate that by sidelining local authorities in the Discharge of Requirements, the public and the current County and District Councils see this as a way of removing local specialist knowledge when considering these requests and a further erosion of local democracy in favour of unaccountable and poorly informed Whitehall administrators?

We do not anticipate that DESNZ's new function as the decision-taker will undermine local authority involvement and local input into the determination process. The creation of this Unit is designed to speed up the process by giving the department the oversight and decision-taking role, as is already the case with a similar Unit in the Department for Transport. The announcement of our response to the Nuclear Taskforce Review clearly states *"DESNZ will establish a new unit within its Infrastructure Planning Delivery team to consolidate and deliver post consent discharge functions in consultation with Local Authority Planning Departments."* Once the new unit is established, DESNZ will act as the decision-maker, but we expect that local specialist knowledge will remain essential to the discharge process and this is already reflected in many of the planning processes that DESNZ administer.

vi) Will the DESNZ unit be tasked with being fully engaged in the Development Consent Order Statutory Consultation and the PINS DCO Examination alongside the existing Statutory Authorities (EA, NE, MMO etc) and Local Government organisations (County and District Councils and any new Local Government Organisations following Local Government Reorganisation)?

Yes - the new Unit will be part of the same planning delivery service in DESNZ that handles DCO applications at the decision-making phase and will therefore be fully engaged. As stated above, this team already determines applications to discharge certain post-consent requirements for DCOs. This will expand that function in respect of electricity network and nuclear projects.

vii) Will developers be expected to contribute financially to the operation of the DESNZ unit for the duration of their projects in a similar way to their existing contributions to County and District Councils?

Earlier this year, the Government consulted on a new charging regime whereby applicants would pay fully cost-reflective charges for all planning functions carried out by this department. The Government will shortly publish an update following that consultation.

viii) Will the new unit take on the DoR responsibility for existing projects such as Sizewell C, Hinkley Point C, plus others such as Scottish Power Wind Farms EA1N and EA2, National Grid's Norwich to Tilbury Upgrade and SeaLink?

It is unlikely that it will be applied retrospectively but the Govt has yet to set out detail of how this is going to work in practice. We are currently at stage one of implementation and will be working on this through the summer

ix) In National Grid's SeaLink Draft DCO, there is an expectation that Discharge of Requirements requests may be directed either at the existing Statutory Authorities

or DESNZ DoR unit, once set up, at National Grid's choice. Is this expectation in line with DESNZ's expectation once the unit is set up?

We are working to have the unit established at the earliest opportunity and will not be able to comment on specific projects until we can clarify operational readiness. All public updates can be found on the Planning Inspectorate page for forthcoming DCOs. The department has responded on a point raised in another network case about the functions of the Unit, which has been published on by the Planning Inspectorate. The response explains that *"work on this unit has been initiated. We intend to publish an operational framework and accompanying guidance and will set out further details of our schedule in due course"*.

x) Will the unit be required, in law, to consult with the existing Statutory Authorities (or new Statutory Authorities following Local Government Reorganisation) before making any decision on any specific DoR request?

The establishment of the new unit will not change the obligation to consult with Statutory Authorities. Any requirements to do so that are in provisions will remain. This is a procedural change, not a legal change, meaning that the authority making the decision will now be this department rather than the Local Authorities or Local Planning Authorities. This will be achieved through the wording within relevant requirements within the Development Consent Order.

xi) Does DESNZ expect DoRs to be assessed and decided (positively or negatively) more rapidly than currently mandated through the existing National Strategic Infrastructure Project legislative regime?

Yes, that is the intention of this change. In accepting this recommendation, Government said: *This will speed up decisions on the meeting of post-consent requirements. This will be focussed initially on nuclear power and electricity networks projects, with a view to extending this to other types of energy projects if evaluation of its effectiveness supports its expansion.*

3. GEOLOGICAL DISPOSAL FACILITY

At the recent NWS Exchange we learnt that NWS has 3 areas of focus for the above ground area for a GDF. Two are in Mid Copeland and 1 in South Copeland.

NWS is now preparing a submission to go to the Secretary of State in May to gain permission to drill deep boreholes. We won't know which of the 3 areas of focus they have chosen until SoS makes his decision which is expected in late Summer. It might be decided that some areas of focus can be dropped - or they might keep all 3 going.

Deep borehole work is expected to take 10 to 15 years. (i.e. to 2036 or 2041)

In the light of this,

(i) when does the Government expect the GDF to be able to start receiving existing nuclear waste?

- Current planning is that a GDF could be operational from the 2050s, but we will need to re-evaluate timings once we have NWS's decision on whether to move forward in Cumbria with deep borehole investigations. DESNZ will come to the next Forum on this.

(ii) when does the government anticipate that a GDF will be ready to take the waste from HPC and SZC?

A GDF won't be needed for HPC's and SZC's waste until around 70 years after the creation of the waste. Spent fuel will need to cool before it can be disposed of.

The interim spent fuel store will have the capability to store, for at least one hundred years, the spent fuel arising from operations.

iii) what is the expected impact on energy bills of constructing a GDF?

There is no expected additional impact on energy bills. The costs of the development, construction and operation of a GDF will be met by the waste owners, in-line with the "Polluter Pays" principle.

New nuclear operators are required to make provision for the costs of disposing of waste from the new build programme via their Funded Decommissioning Programmes.

In the case of wastes from legacy civil nuclear sites, these are public liabilities so the costs in connection with these are met by the UK Government.

Costs associated with EDF's Advanced Gas-cooled Reactor (AGR) fleet and Sizewell B will be met by the Nuclear Liabilities Fund.

(iv) what is the government's Plan B if a GDF turns out to be "unaffordable", as suggested by NISTA?

The government is committed to geological disposal

It is not uncommon for projects to receive a NISTA red rating at specific points in their lifecycle. This is not a reflection of overall delivery performance but rather shows a project's likelihood of successful delivery at a particular moment in time, and if challenges or issues are not addressed.

Nuclear Waste Services will continue to consider more cost effective and faster options for disposal of some of the less hazardous radioactive waste such as some intermediate level waste.

Are you aware that there is insufficient space at SCZ for storage of intermediate level waste? They will run out of storage space before a GDF is ready.

There is the potential for less hazardous ILW to go into near surface disposal facilities which can be built more quickly.

It's important to consider the whole system of disposal capacity.

We are aware and are keeping an eye on it.

4. SIZEWELL C BUSINESS CASE AND STRATEGIC DELIVERY PLAN

When will the SZC Strategy and Delivery Plan be laid before Parliament? Given that it is approaching a year since the government invested £14bn, based presumably on confidence that Sizewell C can be delivered in a strategic manner, how can its continued secrecy be justified?

As per the Office for Value for Money (OVFM) study, which identified Sizewell C as a Government mega-project and therefore requiring a Strategic Delivery Plan (SDP), DESNZ are engaging with NISTA as the SDP guidance and template are developed. We expect to publish an SDP in due course.

Since the Government agreed its investment in the Sizewell C project, DESNZ have published a range of documents that provide a high degree of transparency over the decision.

This includes a value for money study, the project's Economic Licence, the Government support package, and, more recently, the Sizewell C Summary Business Case. This Summary Business Case sets out the basis on which the Government made its investment, and covers key strategic and delivery indicators, including the strategic rationale for the project, its delivery model, and governance arrangements. It also outlines that Parliament will be kept updated on project progress on an annual basis.

Will the SZC Strategic Delivery Plan contain a target date for completion of reactors 1 and 2 within a maximum 12 month time period?

iii) If not why not?

Sizewell C is due to begin operating from the mid-to-late 2030s.

This is one of the largest and most complex infrastructure projects in the UK and will be taking a disciplined approach to delivery to ensure it is built safely, efficiently and successfully.

The exact schedule estimate owned by SZC Ltd is considered to be commercially sensitive. This is to ensure sufficient commercial tension with the supply chain to incentivise efficient delivery. This is in the interests of consumers and taxpayers and ensures Sizewell C actively embeds lessons learnt from other projects.

Rigour and accountability for the project will be ensured through the incentives on the project's investors to deliver Sizewell C as quickly and cheaply as possible. As a shareholder, the government will be working with its partners in the project to keep Sizewell C on track.

The project benefits from a well-developed and robust delivery plan, drawing directly on extensive experience at Hinkley Point C. As with most major infrastructure projects,

delivery is managed against cost, schedule and risk to ensure successful delivery. For these reasons, we focus on the overall expected timeframe rather than a single fixed completion date for a project of this scale.

When will the Full SZC Business Case be published? Given that it is approaching a year since the government invested £14bn, presumably based on this document, how can its continued secrecy be justified?

The SZC Summary Business Case was published in February 2026. This is in line with HM Treasury's guidance on publishing business cases, which requires departments to publish a Summary Business Case, Full Business Case, or Programme Business Case within four months of receiving HM Treasury approval.

NGOs expressed the view that there had been a miscommunication here, as they were still expecting publication of the FBC. It is now apparent that DESNZ does not intend to publish the FBC.

ii) How often will the SZC Business Case be reviewed/updated? Will it be on a regular schedule or as circumstances change? If the latter, what are the criteria for reviewing the FBC?) and will the outcomes of such reviews be published within a specified timeframe?

As set out in the Summary Business Case, DESNZ intends to provide an annual update to Parliament to summarise progress on key project milestones, and report progress on any steps HMG has taken to support project delivery. Through this update, DESNZ will outline any updates in the business case as per the five-case model. The scope and approach to reporting will be kept under review to ensure it remains relevant to policy priorities and project circumstances.

What action is this government taking to

(i) re-assess the future requirements of the electricity grid and

(ii) consider the implications this may have for the Sizewell C full business case?

By 2050, we expect annual electricity demand is likely to at least double, as we electrify transport, heating and industry to decarbonise the economy.

Clean power by 2030 will help prepare us for the rapid growth in power demand expected over the 2030s and 40s. Nuclear projects like SZC have an important role to play in supporting an electricity system that is cheaper, more reliable and low-carbon for the long-term. We would need to defer to analyst colleagues for detailed questions on this modelling.

The Government recognises that significantly increasing electricity network capacity is essential to deliver clean power, strengthen energy security and support growth. The Government supports Ofgem in ensuring strategic investment in the grid, upgrading existing infrastructure, building new network where needed, and reforming grid connections so projects that are ready and strategically important can connect faster. Ofgem's independent regulation also ensures value for money for consumers.

The policy position outlined in the National Energy System Operator (“NESO”) open letter published in December 2024, indicates that, given Sizewell C received planning consent in July 2022, the existing arrangements for Sizewell C grid connection should be eligible to be grandfathered, subject to NESO’s proposals for reforming the connections process being approved by Ofgem and taking effect.

National Grid Electricity Transmission has also confirmed that Sizewell C will retain the same enabling works identified in previous connection agreements (2007-2009).

Regarding the minister’s comments, these are consistent with the government’s plans for an electricity system which is dominated by renewables, but which also includes large-scale nuclear power stations and other generation to ensure a more resilient system.

Does DESNZ expect future nuclear projects to similarly fail to apply the lessons from Fukushima and not have to adhere to relevant NPS provisions?

An assessment of flood risk formed part of the review of Sizewell C’s application for development consent, which was granted by the Secretary of State in June 2022. In the Secretary of State’s decision letter for the Development Consent Order, the Examining Authority “[concluded] that with regard to flood risk at the MDS, the Applicant has demonstrated it has satisfied the requirements of both NPS EN-1 and EN-6”.

Flood risk also formed part of the ONR’s assessment of Sizewell C’s application for a Nuclear Site Licence.

Site licence holders in the civil nuclear industry are required to meet robust standards, which are overseen by the independent regulators - the Office for Nuclear Regulation (the ONR) and the relevant environmental regulator – the Environment Agency (EA), Natural Resources Wales (NRW) or the Scottish Environment Protection Agency (SEPA).

The ONR and the environmental regulators would not allow a nuclear power station to be developed on a site, or to operate, if they judged that it was not safe to do so.

Future projects will need to adhere to the requirements of EN7, as well as EN-1 and any other National Policy Statements that are relevant to their planning applications.

How many years will Sizewell C have to operate to

(i) break-even with the amount of energy expended in building the plant and its related infrastructure, and

(ii) to break-even financially?

- i. We have not analysed how much time would be needed for the plant to generate the equivalent amount of electricity used during construction. We would anticipate – given SZC’s capacity, equivalent to 7% of current electricity demand – that this would happen relatively quickly.

- ii. To provide an answer to this question, it would be helpful to understand what is meant by breaking even financially, e.g. is in terms of the value of electricity generated compared to construction cost?

c) Flood Risk and the Sizewell C FBC

(i) On how many occasions over the full lifetime of the site i.e. to 2160, is Sizewell C budgeted to need to replenish the soft coast sea defences, and

(ii) is the cost of doing so provided in the £38 billion build cost or deemed to be an operational cost, and, if an operational cost, who will bear such costs after the slated 60 years of electricity generation has ended?

(iii) Does the Sizewell C Full Business Case include the cost of adapting the plant's hard sea defences to deal with extreme sea level rise?

(iv) Is the cost of adapting the sea defences included in the £38 billion build cost and if not who will meet the cost if the adaptation is needed after the plant's slated 60 years of operation?

(v) Given the cost of adaptation, has the Full Business Case revisited the cost comparison between adaptation and raising the platform height above 7.3 metres?

i) The number of replenishments and associated costs would be a matter for the Sizewell C Company.

ii) Sizewell C's sea defences are part of the project's design, the Government has confidence in the company's decision making, and our independent regulators' knowledge and capability, including in respect of the project's flood defences. Should you have further questions on sea wall modelling, you may wish to direct them to Sizewell C Ltd.

iv) £38bn is the company's cost estimate for construction. Post-operational costs associated with decommissioning the plant would be met through the project's Funded Decommissioning Programme. SZC Ltd will be responsible for implementing this, as the project's operator during decommissioning.

iii), v) The SZC Summary Business Case was published in February 2026 where we set out the overall expected cost of the project's construction (£38bn 2024 prices). The exact detail / breakdown of costs related to project spend is commercially sensitive, we therefore cannot comment on this.

Question and Answer session with NGO Forum members and Lord Vallance session
14th May 2026

(Sizewell C) Question 1: How can the continued failure to provide a specific date (or even a year) for completion of Sizewell C be justified?

Answer:

- Sizewell C Ltd plan to begin operating the project from the mid-to-late 2030s. As a shareholder in the company, government will work closely with its fellow investors to keep the project on track, and to support delivery of the project quickly as possible.
- The company is incentivised to deliver below a baseline estimate of July 2039, which since the meeting with the minister has been disclosed in the [National Audit Office's report](#) on Sizewell C.
- In addition to the discussion in the meeting, we would also note that [a review](#) published by the NAO, on lessons learned on the governance decision making relating to mega-projects, recommends that projects use ranges for cost and schedule estimates, to reflect the complexity of megaprojects and delivery risks.

(Sizewell C) Question 2: Referring to recent correspondence with TASC about the lack of adaptation of flood defences in the Sizewell C project approved in the DCO, why does the Minister believe it is appropriate to ignore TASC's legitimate questions about our concerns?

Answer:

- The Government takes the safety and resilience of nuclear sites extremely seriously, including resilience to climate change impacts. Lord Vallance responded to recent correspondence from TASC setting out their concerns.
- We will continue to engage, as appropriate, with regulators and the East Suffolk Council to ensure that impacts on people, place and the environment are fully considered over the project's lifetime. Alan McGregor confirmed that the Environment Agency are continuing to monitor this specific situation.

(Sizewell C) Question 3: Local businesses are losing tens of thousands of pounds from disruption due to Sizewell C road closures but there is no compensation available. Why not?

Answer:

- Sizewell C Ltd is committed to listening to and working with local communities to understand and address concerns. The company has multiple community

forums where local councillors can represent community concerns including issues raised by businesses.

- Sizewell C Ltd works very closely with local authorities, infrastructure partners (including National Grid and Scottish Power Renewables) and other stakeholders to coordinate road improvement works and manage construction impacts, helping to minimise congestion and disruption.
- Sizewell C Ltd's Deed of Obligation, sets out a £250m package of funding for local initiatives and support to local communities during construction. The project also plans to invest £4.4bn in the East of England during construction.
- The Minister noted more detailed views from forum members on SZC Ltd's compensation schemes, and engagement between local communities and the project; he asked for DESNZ officials in the Sizewell C sponsorship team to look into this in more detail.

(GDF) Question 4: Will the Minister clarify the evidence he gave to the ESNZ committee about his understanding of the status of France's GDF, which his evidence suggested was operational, when it has not, as far as we are aware, begun construction?
(transcript below)

Answer:

Lord Vallance clarified that his statement was not intended to imply the French facility is operational. They have so far developed an underground research laboratory and have applied for a construction license. The UK should learn from the progress made by France where applicable.

NO TIME FOR THIS QUESTION IN THE MEETING, SO OFFICIALS HAVE PROVIDED THE FOLLOWING WRITTEN RESPONSE:

(Hinkley Point C) Question 5: What is the government's expectation of the time gap between the start of HPC reactor 1 and HPC reactor 2? Recent milestones (ie dome lift) suggest they are at least 18 months apart and there are rumours that this gap could widen, possibly considerably, with the company neglecting Reactor 2 in order to start income generation as soon as possible?

Answer:

- EDF's current target for commercial operations for Unit Reactor One is 2030 with Unit Reactor Two following 12 months after the COD for Unit One.
- HMG would like to see both units online as soon as possible but the construction schedule, including any decisions around pacing of each unit, is

for EDF as majority owner of the plant. HMG is not privy to these decisions by EDF.

- Under the CFD, EDF is incentivized to bring both units online as soon as possible.
- *Further information on this incentivization (all public):* For each day that Unit 1 is not online after 1 May 2029, the CFD term reduces by one day. So for example, if Unit 1 came online on 1 May 2030, the CFD will have lost a year and be ‘only’ 34 years. The same thing applies to Unit 2, but the ‘start date’ for that unit is 1 November 2029 (ie 6 months after Unit 1).

(Scotland) Question 6: Will the Minister confirm that the UK Government would not impose new nuclear in Scotland assuming it will be an SNP majority Scottish Government after the election, or if there is a coalition opposed to new nuclear.

Answer:

- New nuclear projects can deliver millions of pounds of investment and thousands of high-quality jobs to a region, as you will know from Torness and previous nuclear power stations in Scotland.
- In response to growing cross-party interest in new nuclear power in Scotland, the Department has asked Great British Energy - Nuclear to assess Scotland’s potential for new nuclear development.
- We remain open to discussions on deploying new nuclear technologies in Scotland but recognise that planning is a devolved matter and it is for Scottish Government to choose their position.

(Lobbying) Question 7: There have been recent articles relating to Britain Remade's links to EDF's lobbyist, Stonehaven, and their funding coming from USA based individuals/organisations e.g. [The Ferrett](#) and [Danica Priest](#). Reflecting on the clear influence that lobby groups such as Britain Remade are having on the UK's energy policy, what background checks, if any, does DESNZ run to check who funds these lobby groups?

Answer:

- The Government recognises the importance of transparency and integrity in how policy is developed, including engagement with external stakeholders.
- Lobbying and advocacy activity in the UK is regulated through a combination of statute, transparency requirements and codes of conduct, rather than through departments carrying out background checks on the funding of individual organisations.

- Within this framework, departments such as DESNZ engage with a wide range of stakeholders — including industry, civil society, think tanks and campaign groups — to ensure policy is informed by diverse perspectives. Engagement does not imply endorsement, and policy decisions are taken by ministers, informed by evidence, analysis and the public interest.
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ESNZ Committee Transcript (linked to Q4 on GDF)

Q397 Chair: *Why has Finland managed to build its GDF when we are still having these conversations?*

Lord Vallance: *If you look at the timeline for Finland, it is very long. It has done it because it started much earlier in its thing, but it was still something like a 30-year timeline, from the time it agreed it was going to do it to doing it. It has not been quick anywhere. France has done it with geological disposal facilities, and there is a lot to be learned from there. One thing I am keen to see is what we can learn from where other places have done it. I cannot comment on why it has not been done until today.*

Q398 Chair: *We have the hope that you are learning from other countries and applying those learnings, where it is working anyway.*

Wera Hobhouse: *Do not go to Germany.*

Lord Vallance: *Finland and, as I say, France have done it. We would be mad not to learn from what they have done and understand how to do this. There is a lot to know about the geology as well.*