

Tom Samson,
CEO, NuGeneration Ltd
7th Floor, Piccadilly Place,
Manchester, M1 3BN

22nd April 2016

Dear Mr Samson,

Stage 2 ‘proposed scheme’ consultation 14th May to 30th July 2016 and MMO licence for offshore survey.

I write on behalf of CORE in relation to the Stage 2 public consultation starting next month. As we understand it the assessment made and conclusions drawn by NuGen from consultation responses, including those of last year’s consultation, will underpin the Development Consent Order (DCO) application that NuGen expects to make in Spring 2017.

We note MMO’s approval of NuGen’s marine licence application (MLA/2015/00475) on 21st April 2016 in relation to the proposed offshore geotechnical survey required to ‘inform the design and location of cooling water tunnels and marine infrastructure’ for Moorside. We further note that the licence approval date represents a three week delay to the 1st April licence start date originally projected by NuGen in its licence application to MMO last year.

Irrespective of this delay, we have major concerns that, for Stage 2 consultation purposes, NuGen will be unable to provide the detailed information (through an Environmental Impact Assessment or other consultation document) on the precise location and extent of the seawater cooling system proposed for Moorside that will enable consultees to make a reasoned response on this vital element of NuGen’s plans.

It is patently clear that, given the timescale for the offshore survey - plus any extension due to adverse weather - data from the completed survey cannot be collated, assessed and conclusions reached in time for inclusion in the Stage 2 consultation documents on 14th May. Indeed, with or without the three week delay in securing the MMO licence, such information will not even be available by the end of the consultation on 30th July.

The absence of firmed-up detail of Moorside’s seawater inlet and outfall cooling tunnels and other forebay structures for the Stage 2 consultation is wholly unacceptable. The importance of this major element of the Moorside project cannot be overstated and its omission not only significantly reduces the credibility of the consultation process but also risks undermining the validity of the DCO application itself.

It remains to be seen whether the eventual determination later this year of the precise location of the sub-seabed cooling tunnels and associated facilities has any impact on the final reactor footprint. Should there be such an impact, then the credibility of the Stage 2 consultation will be further eroded.

Under these circumstances, CORE urges that immediate consideration is given by NuGen to extending the Stage 2 consultation period to point at which the location of Moorside's offshore seawater cooling system and associated marine infrastructure has been finally determined and the corresponding data is available to consultees. Without an extension, and in living up to its claim of openness and transparency in its dealings with West Cumbrian communities, NuGen must indicate without delay how else the matter may satisfactorily be resolved in a way that enables stakeholders and consultees to have their rightful input towards the DCO on this important component of the Moorside project. We therefore seek your reassurance that resolution of the matter will be initiated by NuGen without further delay.

Given the public interest in Moorside, we intend to circulate this letter to the media.

Yours sincerely,

Martin Forwood.
CORE Campaign Coordinator