

Submitted via email

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Consultation response: National Policy Statement for nuclear energy generations (EN-7)

Question 1: To what extent do you agree with the modification of this approach in light of the consultation feedback: To retain the < 50 MW (electric) threshold in the existing planning framework and to review our position in the future?

Disagree

Most Local Planning Authorities (LPAs) do not have the expertise or resources to directly handle an application for a nuclear generating station. Furthermore, public confidence in the development of nuclear projects is at best weak. Micro nuclear reactors would be a new technology, and as such would need to secure public confidence in the first instance.

Therefore, in these formative stages of a renaissance of nuclear energy in the UK, any nuclear fission project should be considered Nationally Significant, even if under the 50MW threshold.

If smaller scale developments are to be taken forward through the TCPA then this will present challenges to Local Planning Authorities (LPAs). We propose that additional planning guidance be developed, in particular to support LPAs who do not currently host nuclear sites. Guidance would also support LPAs to develop policies in local plans to reflect the potential for smaller scale nuclear sites.



Question 2: To what extent do you believe the draft National Policy Statement is adequately future proofed to accommodate advancements in nuclear technologies?

The consultation document sets out that the NPS will be reviewed every 5 years (3.6.8). EN7 should include a clear commitment to a regular review processes to ensure that it is updated to reflect latest developments. We believe that 5 years should be the minimum but early review could be undertaken where necessary. This will be essential to support newer technologies such as SMRs and AMRs which look to provide quicker and more flexible deployment.

Question 3: Are there specific planning or siting considerations that should be addressed to ensure the National Policy Statement remains flexible to deployment of nuclear in diverse locations?

Yes.

The need for the developer to engage early with Local Authorities is essential to understand local context, priorities and objectives set out in adopted and emerging local policy and strategy documents (including their supporting evidence base). This could include:

- Local Plans (including Mineral and Waste Plans),
- Economic Strategies,
- Local Nature Recovery Strategies and
- Climate Emergency Strategies or 'green masterplans'

This should be set out in relevant sections of the NPS.

Also, it is not clear how this approach would be used to managed a phased approach (3.5.2), for example if an initial development was of 40MW but then a proposal of 100MW of additional capacity made later.

Early engagement will be key enabling opportunities and the delivery of the right project with the right benefits for the area.



Question 4: To what extent do you agree with the proposal to remove the distinction between previously exclusionary and discretionary criteria (see paragraph 1.1.7 (v) for more information)?

Agree.

Question 5: The government currently plans to retain the Semi-Urban Population Density Criterion in EN-7.

Neutral.

The document is correct (3.6.7) that many SMR and AMR technologies are at an early stage of development, and there is therefore only limited evidence available to demonstrate that they present a significantly different risk to existing technologies.

The Office for Nuclear Regulation (ONR) should regulate that any installation is safe, but it seems sensible for a developer to realise that this is a criteria that may make deployment more difficult.

Question 6: We are open to revising the Semi-Urban Population Density Criterion in the future. How should this criterion change in the future to better support the deployment of advanced nuclear technologies, and what evidence supports your suggestion? Please reference your sources.

We have no further comment on this issue, except that any change must be guided by the views of experts and the regulators, particularly the Office for Nuclear Regulation (ONR).

Question 7: If it's not already addressed elsewhere (for example in EN-1 and the Planning Inspectorate Nationally Significant Infrastructure Project Guidance), are there any specific areas of the draft EN-7 where further clarity or guidance is needed to help ensure successful implementation by developers, planners, and regulators?



Yes.

We believe that EN-7 does not give adequate prominence to the need for early engagement with host and affected communities and Councils; or the efficiencies to be gained for developers in their planning, design and assessments by understanding host/affected communities and Councils aspirations, policies, objectives, concerns and questions early on.

We also believe that there should be a clear statement in support of a framework for the determination of community benefits around all new nuclear developments. There would be in addition to mitigation/compensation measures.

There are a number of other areas where we believe further clarity or guidance is needed, including:

- Biodiversity and Geological Conservation
- Radioactive waste and spent nuclear fuel
- Semi Urban Population Density
- Size of site
- Socio-economics

Question 8: Would additional support or information from the government be beneficial and assist developers intending to apply for Development Consent in implementing EN-7 and proceeding through the Development Consent Order pre-application process?

No comment.

Question 9 (OPTIONAL): If you wish to be kept informed of the development of the supplementary information to the National Policy Statement, please share your contact details

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Question 10: Please identify the single main sector or interest you represent in relation to the siting of new nuclear power stations.

Local Government.