



SSA criteria Consultation
Nuclear Unit
Bay 135
Department for Business, Enterprise
and Regulatory Reform
1 Victoria Street
London
SW1H 0ET

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Dear Sirs

TOWARDS A NUCLEAR NATIONAL POLICY STATEMENT

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

The Institute welcomes the opportunity to comment on the consultation.

The Institute's principal concern is that the process for identifying sites for new nuclear power proposals and agreeing their details should contain a robust evaluation of heritage assets. Broadly we believe the process proposed is acceptable, as it relies on a comprehensive process of Strategic Environmental Assessment. We do, however, have some detailed concerns which are set out below.

Question 1 Do you agree that, at this time, the SSA should focus only on sites that are nominated as being suitable candidates for deploying new nuclear power stations by the end of 2025? If not, why not?

Answer 1 Institute agrees with this in principle. Bearing in mind the lead times to procuring projects of this kind, it is sensible to concentrate on those locations which are likely to produce successful outcomes rather than attract possible applications where successful outcomes are less likely.

Question 2 Do you agree that the overall SSA process provides an appropriate mechanism for identifying and assessing those sites which are strategically suitable for the deployment of new nuclear power stations by the end of 2025? If not, how should the process be changed?

Answer 2 The Institute is pleased to see the comprehensive list of heritage assets at paragraph 2.124 and the strength of the supporting advice in subsequent paragraphs to the nominators of proposals.

However, as the heritage criterion is discretionary rather than exclusionary, the guidance is couched entirely in terms of avoidance, minimization and mitigation of effects. The Institute would like to see it made clear that the SEA process could lead to a proposal being wholly unacceptable in terms of its environmental impact.

The Institute supports the process in which an SSA leads to the acceptance of a proposal allowing the identification of locally important issues through the "flagging process".

Question 3 Do you have any other comments on the practicalities of the proposed SSA process, such as the timetable for nominations and the duration of the nomination period?

Answer 3 The proposed process is supported in principle. It is not clear at stage 2(4) to whom environmental information will be available. The Institute thinks this should be openly available to interested parties in order to give them the opportunity to properly consider it prior to the consultation at stage 3. The period for consultation at stage 3 is not stated. The Institute would like to see this set at no less than 90 days in accordance with Government consultation policy.

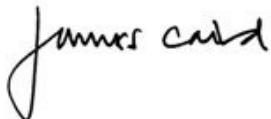
Question 4 Do you agree that the proposed exclusionary and discretionary criteria are appropriate for the assessment of a site's suitability at a strategic level? If not, how should the criteria be changed to achieve this objective and, specifically, are there any additional criteria that should also be used? Should the classifications of any of the exclusionary criteria, discretionary criteria, or issues for local consideration be changed?

Answer 4 The Institute understands the process that has led to heritage assets being classed as discretionary rather than exclusionary criteria. The problem we see with this approach is that heritage assets vary greatly in their significance. Some, such as World Heritage Sites, are of international importance and we wonder whether this could be reflected in the process? If distinguishing between heritage assets in this way is considered unworkable, we would point out the importance, referred to in our answer to Question 2, of allowing discretionary factors being allowed where appropriate to indicate decisively against a proposal. The Institute would not wish to see a state of affairs in which the environmental impacts of discretionary criteria inevitably led only to mitigation or reduction of those impacts.

Question 5 Do you agree that the proposed SSA is appropriate to produce a list of strategically suitable sites for the purposes of setting the framework for the Infrastructure Planning Commission's decisions? If not, how should the process be changed to achieve this objective?

Answer 5 Given that the likely candidates for nomination are a relatively short list of known sites, the Institute is content with this aspect of the proposals. We would wish to see the framework reviewed in the light of experience for any extension of the framework beyond 2025.

Yours faithfully



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