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BUILDING · CONSERVATION

Making Heritage Work

Department of Energy and Climate
Change

Choosing sites for nuclear power
stations consultation

(to be submitted via on-line form)

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Dear Sirs

CHOOSING SITES FOR NUCLEAR POWER STATIONS

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.

Thank you for inviting us to participate in this consultation.

We note that the majority of the sites are close to existing or former nuclear power installations and thus are able to make use of existing transport and transmission infrastructure.

Whilst we are not in a position to comment in detail on individual sites we have a number of general concerns.

The nomination reports deal cursorily with heritage and other cultural aspects. The proximity of scheduled monuments and other heritage assets is noted often with a single sentence dismissing the likelihood of any adverse impact. It seems to us that in many cases there is likely to be serious adverse impact to such features of interest by the construction of a nuclear power site within a few hundred metres. We believe much more must be done to properly assess environmental impacts of this kind. The same comment applies to impacts of Ramsar and other ecological sites and views from National Parks and Areas of Outstanding Natural Beauty.

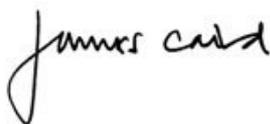
Some of the impacts of the various proposals will be felt well beyond the boundaries of their sites, for example traffic generation and transmission lines. These impacts should be subject to the proper appraisal of impacts on historic assets: listed buildings, parks and other historic landscapes, conservation areas and other town and village environments. Potential visual impacts may be capable of being overcome by careful

design and siting of buildings and design of landscaping. Any assessment of the potential impacts should include reference to possible mitigation of this sort.

We believe that many potential adverse impacts may be overcome by constructive engagement with the communities involved. No development consents should be considered without reference to community engagement by prospective developers at the application stage and any consents should contain obligations for developers to continue engagement during the construction period and the operation of the plant.

We are concerned about the apparent large size of the land requirements compared to existing and former plants. In some cases (such as Wylfa) it is beyond belief that such a large site should be necessary. In others (such as Dungeness) it is considerably more modest. Land in Britain is a scarce resource and it is incumbent upon all industries to use it as economically as possible. We hope that, whichever sites are selected, a very critical approach will be taken to the amount of land required to implementing the project and to the proper restoration of any used on a temporary basis in the construction period.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large initial 'J'.

James Caird
Consultant Consultations Co-ordinator