**Nuclear Industry Association Response to the Energy Security and Net Zero Committee’s ‘National planning for energy infrastructure’ Inquiry.**

The Nuclear Industry Association (NIA) welcomes the opportunity to respond to Energy Security and Net Zero Committee’s ‘National planning for energy infrastructure’ inquiry.

The NIA is the trade association and representative body for the civil nuclear industry in the UK. We represent more than 300 companies operating across all aspects of the nuclear fuel cycle, including the current and prospective operators of nuclear power stations, international designers, and vendors of nuclear power stations, and those engaged in decommissioning, waste management and nuclear liabilities management. Members also include nuclear equipment suppliers, engineering and construction firms, nuclear research organisations, and legal, financial and consultancy companies.

Due to the diversity of our membership, our views in this submission will cover high-level, industrywide matters. Our members may choose to make their own detailed submissions.

**Executive summary**

We welcome the alignment of the Overarching National Policy Statement for Energy (EN-1) with the Clean Power 2030 Action Plan and the objective of reaching Net Zero. As recognised by the Government in EN-1, nuclear “provides the UK with continuous, reliable, safe low-carbon power” and “additional nuclear beyond Hinkley Point C will be needed to meet our energy and Net Zero objectives”.[[1]](#footnote-1) We welcomed the inclusion of nuclear in the Critical National Priority (CNP) policy intended to reduce delays in deployment of low carbon infrastructure. We urge Government to streamline the consenting process for nuclear projects, and balance considerations of environmental risks versus benefits in the context of climate change to support nuclear deployment in the leadup to Net Zero by 2050. The leading cause of habitat loss and biodiversity loss is climate change, so it is imperative of deploy low carbon energy at speed and at scale to protect the natural environment. The National Policy Statements must reflect this reality in balancing the benefits of low carbon energy with the local and often temporary environmental impacts of deployment

**Clean Power 2030**

The Government's Clean Power 2030 Action Plan stated that, to achieve this target, most new electricity transmission and offshore wind projects will need to secure planning consent by 2026, and most large-scale onshore renewable projects will need to do so by 2028.

1. **Do the draft updated energy National Policy Statements provide clear enough guidance to planning decision-makers, to allow them to prioritise nationally significant infrastructure projects that must secure development consent within these timescales?**
	1. No comment.

**Strategic planning**

1. **How should the National Policy Statements for energy infrastructure interact with the strategic energy and network plans currently being developed by the National Energy System Operator? For example, the Strategic Spatial Energy Plan and the Centralised Strategic Network Plan. Is this relationship sufficiently clear?**
	1. The relationship is not sufficiently clear at present. We urge Government to ensure that the National Policy Statements for energy infrastructure, and the strategic energy and network plans developed by the National Energy System Operator are aligned to support nuclear deployment in the lead up to Net Zero by 2050.
		1. We welcome the Government’s recognition of the vital role of nuclear in the energy transition in EN-1, and urge Government to ensure that nuclear is also prominently represented in the SSEP.
	2. NESO’s consideration of new nuclear deployment to support their modelling and strategic energy planning should take into account:
		1. Prevailing regulatory requirements for siting new nuclear.
		2. Traditional nuclear siting hierarchy, plus a consideration to alternative thinking and approaches enabled by EN-7.
2. **How should the National Policy Statements take account of emerging government policies affecting energy infrastructure projects and spatial management, such as the Planning and Infrastructure Bill and the Land Use Framework? Are any issues particularly relevant?**
	1. Yes. It is critical that the Planning & Infrastructure Bill and Land Use Framework should be taken into account and reflected in the National Policy Statements. The Planning & Infrastructure Bill will introduce Environmental Development Plans (EDPs) that will need to be comprehensive and require clear legislative and non-legislative support to ensure their success. National Policy Statements should clearly outline the role of EDPs.
	2. Streamlining of the planning process should be outlined and supported clearly in the National Policy Statements. Legislative decisions in the Planning & Infrastructure Bill to reduce consultation requirements and speed up planning approval processes must be included to ensure clarity for planners, developers and wider stakeholders.

**The 2024 updates to the National Policy Statements for energy (EN-1 to EN-5)**

1. **What are the most important changes needed to these National Policy Statements since the last update in 2024 and do the Government’s proposed drafts deliver these?**
	1. We welcome the alignment of EN-1 with the Clean Power 2030 Action Plan and the objective of reaching net zero. The alignment of EN-1 with these objectives is an important development in the National Policy Statement since the last update in 2024.
	2. In order to achieve Clean Power by 2030 and Net Zero by 2050, it is vital that these policy objectives are considered throughout the consenting process for low carbon energy projects. These objectives should inform a balanced and holistic assessment of environmental impacts associated with nuclear infrastructure.
		1. The environmental risks associated with nuclear should be weighed against the risks associated with climate change if the UK does not transfer to a secure, low carbon energy system in a timely manner.
		2. We strongly encourage EN-1 to provide guidance on deciding on an acceptable level of risk that considers the benefits of low carbon energy technologies versus the associated environmental risks, in the context of climate change.
			1. When an environmental impact is identified, the Government should specify in EN-1 clear ways to compensate for that impact.
			2. EN-1 should align with the Planning & Infrastructure Bill will which legislate for Environmental Delivery Plans (EDPs) as means of compensating for environmental impacts.
	3. To speed up deployment of low carbon energy infrastructure, we strongly encourage Government to minimise replication and reassessment in the consenting process.
		1. For example, Habitats Regulation is assessed multiple times throughout the consenting process for nuclear infrastructure, which slows down the deployment of nuclear projects. We would encourage Government to adopt a single assessment of Habitats Regulation which could be considered throughout the consenting regime.
	4. To further streamline the consenting process for low carbon infrastructure, we encourage Government to assess the length of supporting documents required for Environmental Impact Assessment.

1. **How successful were the changes introduced in the last update, including the Critical National Priority policy presumption for low carbon infrastructure? Are any modifications needed?**
	1. We welcomed the inclusion of nuclear in the Critical National Priority policy presumption of EN-1 in 2024.
		1. The 2025 draft National Policy Statement rightfully recognises that faster deployment of nuclear is vital for achieving net zero.
	2. Whilst we welcome the policy presumption, it is too early to determine whether CNP policy is effectively speeding up the deployment of low carbon infrastructure.
		1. To streamline nuclear deployment in support of Net Zero by 2050, the CNP policy must have an impact beyond EN-1 and inform decision-making in other government departments and agencies involved in nuclear regulation – it is crucial that nuclear infrastructure is considered a critical national priority throughout the consenting process.

**Balancing competing considerations**

With regards to renewable energy projects and/or the design of electricity network infrastructure, do the draft updated statements allow for sufficient consideration of:

1. **landscape impacts;**
2. **wildlife impacts;**
3. **heritage and archaeological impacts; and**
4. **the viability and feasibility of underground and offshore cable routes?**
	1. No comment
5. **Do the draft statements strike the right balance between reducing delays, consideration of national strategic spatial plans, and detailed scrutiny of individual projects?**
	1. It is too early to determine whether EN-1 strikes the right balance between reducing delays, consideration of national strategic spatial plans, and detailed scrutiny of individual projects.
	2. We welcome the effort to reduce delays through the CNP policy presumption.
		1. We urge Government to ensure that the CNP policy is also informing the work of other government departments involved in the consenting process for nuclear projects.
	3. We urge Government to streamline the consenting process, and provide guidance on acceptable risk for low carbon energy projects in the context of climate change, to balance scrutiny of individual projects with reducing delays (please see response to Question 4 for further details).

**Electricity network infrastructure**

**Do the draft statements:**

1. **provide clear enough guidance on when pylons should be used for electricity transmission and distribution cables, and when they should be laid underground or offshore; and**
2. **establish a coherent and justified policy for determining when one of these route design options should be chosen over another?**
	1. No comment

**Renewable energy infrastructure**

1. **Is there clear enough guidance on how much weight should be given to the availability of a grid connection in considering the overall benefits and impacts of a proposed project, given the significance of this factor in determining site selection?**
	1. No comment
2. **Do the draft statements provide sufficient clarity on how to manage trade-offs in how land is used and, in particular, when agricultural land grading should (or should not) count against the suitability of a site for renewable energy generation?**
	1. No comment
3. **Should there be any amendments to the National Planning Policy Framework to align it with the updated energy National Policy Statements?**
	1. No comment

**Further Information**

The NIA is happy to provide more context, or any clarifications desired on the content of our response and to ask our members where appropriate for additional information that may be useful.

Please contact Elisabeth Roden, Policy Analyst for the Nuclear Industry Association, at elisabeth.roden@niauk.org to do this.

1. Department for Energy Security and Net Zero (2025) Overarching National Policy Statement for Energy (EN-1). Available at: <https://assets.publishing.service.gov.uk/media/68093d68148a9969d2394f59/draft-nps-en-1.pdf> [↑](#footnote-ref-1)