Nuclear Industry Association Response to the Ministry of Housing, Communities and Local Government's 'National Planning Policy Framework: Proposed Reforms and Other Changes to the Planning System' Consultation

The Nuclear Industry Association welcomes the opportunity to respond to the MHCLG's 'National Planning Policy Framework: proposed reforms and other changes to the planning system' consultation.

The NIA is the trade association and representative body for the civil nuclear industry in the UK. We represent more than 320 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.

New nuclear is vital for achieving Net Zero by 2050 with energy security and strong economic growth. According to the United Nations Economic Commission for Europe (UNECE), nuclear has the lowest land use, lowest ecosystem impact and the lowest lifecycle carbon of all generating technologies at 5.1-6,4g CO2/kWh.[1] It also provides geographically concentrated, predictable baseload power while creating well-paying, high-skilled jobs for communities that need them the most.[2]

In the 2025 Nuclear Regulatory Review, the Nuclear Regulatory Taskforce found that disproportionate, excessive, and inconsistent regulatory and planning processes have made nuclear deployment slower and more expensive. To help streamline the planning process for nuclear projects, we urge MHCLG to adopt in the National Planning Policy Framework (NPPF) recommendations 24 and 37 put forward in the Nuclear Regulatory Review.[3]

Outside the Nationally Significant Infrastructure Projects (NSIP) regime, projects are judged against local development plans and the National Planning Policy Framework (NPPF), which currently do not apply the same "Critical National Priority" (CNP) policy as the energy National Policy Statement (NPS) which applies to NSIP. The absence of the CNP in conventional planning has led to decisions in which the Secretary of State has said that "as the proposal does not fall within the scope of the Planning Act 2008 as Critical National Priority infrastructure, she does not attribute weight to EN-1 in this

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[1] United Nations Economic Commission for Europe (2022) *Carbon Neutrality in the UNECE Region: Integrated Life-cycle Assessment of Electricity Sources*. Available at https://unece.org/sites/default/files/2022-04/LCA_3_FINAL%20March%202022.pdf

[2] Oxford Economics (2025) *The Economic Impact of the Civil Nuclear Industry*. Available at: https://www.niauk.org/wp-content/uploads/2025/06/2025-Economic-Impact-of-the-Civil-Nuclear-Industry.pdf

[3] John Fingleton (2025) *Nuclear Regulatory Review 2025*. Available at: https://assets.publishing.service.gov.uk/media/692080f75c394e481336ab89/nuclear-regulatory-review-2025.pdf

decision." [4] This means that applications for enabling works, for nuclear development below 50 MWe, and for nuclear-adjacent development like factories and plants do not enjoy the benefits of CNP. To address this, the Nuclear Regulatory Taskforce has recommended that The Secretary of State for Housing, Communities & Local Government should update the NPPF to contain the same CNP presumption as the NPS. The Taskforce has also recommended for the CNP to be rephrased by DESNZ with stronger language which reflects the need for new low-carbon infrastructure. We urge recommendation 24 to be adopted by MHCLG, with the CNP presumption included in the NPPF in the rephrased form.

Furthermore, we urge MHCLG to adopt the Nuclear Regulatory Taskforce recommendation 37, for the Geological Disposal Facility (GDF) and associated site investigation development to be given "Critical National Priority" status by MHCLG in both the National Policy Statement, and either the NPPF or National Development Management Policy. The GDF is vital to managing the most hazardous radioactive waste in the long term and should be afforded priority given the impact it could have on current decommissioning operations and waste management. We do, however, believe that a DCO can be proportionate for borehole investigations, at the discretion of the body conducting the investigation. The DCO process provides clarity and certainty on timescales while retaining the benefits of the extensive public engagement and participation requirements. It makes sense to ensure all aspects of the development are given the same status for complete consistency and to help further streamline the GDF process.

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.

[4] The Planning Inspectorate (2025) *National Infrastructure Consenting Portal – Project EN010148 Documents*. Available at: https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010148/documents.