

# **COUNCIL BUINSESS COMMITTEE**

## **Responding to the open consultation on a National Policy Statement for Nuclear Energy Generation (EN-7)**

**26 March 2025**

### **Report of Chief Officer - Planning and Climate Change**

#### **PURPOSE OF REPORT**

To advise Members of the publication of the consultation on the draft National Policy Statement for nuclear energy generation (EN-7) and to provide an opportunity to consider a proposed consultation submission.

This report is public

#### **RECOMMENDATIONS**

- (1) That the report be noted and that the responses to the consultation questions as proposed as Appendix 1 are considered and submitted as the Council's corporate response to the consultation.

#### **1.0 Background**

- 1.1 The current National Policy Statement for Nuclear Power Generation (known as EN-6) was published by the Department of Energy and Climate Change in July 2011. This National Policy Statement (NPS), in the context of the National Policy Statement for Energy (known as EN-1), provides the current primary basis for decisions taken by the Infrastructure Planning Commission (IPC) when considering planning applications for nuclear power stations. EN-1 provides direction on all high-level objectives, policy and regulatory framework for new Nationally Significant Infrastructure Projects (NSIPs), whilst EN-6 provides further, use-specific direction on proposals for nuclear power generation. EN-6 provides guidance on matters such as the impacts of nuclear power, flood risk, water quality and resources, coastal change, human health and well-being.
- 1.2 Part 4 of EN-6 (2011) provides a list of eight potentially suitable sites for the deployment of new nuclear power stations in England and Wales before the end of 2025. These eight sites, listed below and overleaf, were originally identified by the Energy Secretary in 2009.
- Bradwell (Essex)
  - Hartlepool (County Durham)
  - Heysham
  - Hinkley Point (Somerset)

- Oldbury (Gloucestershire)
- Sizewell (Suffolk)
- Sellafield (Cumbria)
- Wylfa (Anglesey).

- 1.3 These sites continue to be recognised in the planning framework and, in the Government's opinion, remain well-placed to host new nuclear projects. For instance, paragraph 1.7.2 of the current EN-7 consultation states that these sites, of which Heysham is included, "*continue to have advantages for this purpose [nuclear infrastructure], as at the date of the designation of this National Policy Statement, including the potential to establish sufficient energy transmission infrastructure relatively swiftly and providing enough land area to accommodate nuclear infrastructure*<sup>1</sup>".
- 1.4 By the end of 2025 only two of the potentially suitable sites are under (new) development. The government now wishes to update EN-6 with a new Statement (EN-7) which will set out the criteria developers must meet in their applications for Development Consent, including on site assessment and the design of the proposed nuclear infrastructure, to provide a robust policy framework to guide decision-making.
- 1.5 Therefore, on the 6 February 2025 the Department for Energy Security & Net Zero (DESNZ) published an open consultation on a National Policy Statement for Nuclear Energy Generation (EN-7). The consultation provides an analysis and the Government's response to the initial, first-round consultation that took place in January 2024, titled '**A National Policy Statement for new nuclear power generation: new approach to siting beyond 2025**'.
- 1.6 EN-7 looks to build on previous work, from 2009, and also work that has taken place over more recent years by the last Government, who published the '**British Energy Security Strategy<sup>2</sup> (BESS)**' in April 2022. The BESS aimed to accelerate the Government's ambition to support the deployment of low carbon and renewable technologies such as offshore wind, nuclear and hydrogen. A further central Government consultation was undertaken in 2023 regarding '**Planning for new energy infrastructure: revisions to National Policy Statements**<sup>3</sup>'.
- 1.7 The overall aim has been for Government to develop a criteria-based approach to considering sites for Small Modular Reactors (SMRs) and Advanced Modular Reactors (AMRs), as well as gigawatt-scale (GW) plants and to support nuclear infrastructure development on a more diverse range of sites. This would be reflective of the emerging diversity in nuclear technologies. The new '**Draft: National Policy Statement for nuclear energy generation (EN-7)<sup>4</sup> (2025)**' aims to bring all previous detail together.
- 1.8 The Government considers that nuclear has an essential role in making Britain a "*clean energy superpower*" and it is their view that nuclear *provides "a source of clean, stable and reliable power as well as creating opportunities to deliver security around both energy and the climate"*. The Government also consider that a focus on developing the nuclear economy will provide economic security for workers and communities across the country.

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<sup>1</sup> Para 1.7.2 of DRAFT: National Policy Statement of nuclear energy generation ([EN-7](#))

<sup>2</sup> British Energy Security Strategy (2022) ([policy paper](#))

<sup>3</sup> Planning for new energy infrastructure; revisions to National Policy Statements ([consultation outcome](#))

<sup>4</sup> Draft: National Policy Statement for nuclear energy generation ([EN-7](#))

- 1.9 By way of an example, the Government are progressing Hinkley Point C, Sizewell C and the Great British Nuclear Small Modular Reactor competition. Additionally, they are working with the wider industry to break down the barriers to investing in nuclear, which include planning constraints, grid constraints, and issues regarding supply chains and skills. Resolving these issues can only bolster the UK's energy security, with the added benefits of the creation of high-quality jobs, driving growth and supporting climate action.
- 1.10 EN-7 is essential to the delivery of this vision. When published in its final form, EN-7 will set out the criteria that developers must satisfy within their application for Development Consent. It will provide a robust policy framework to guide decision-making.
- 1.11 There is precedent for the City Council to submit a response. It responded to the previous nuclear consultation (EN-6). A report was presented to Council Business Committee on 14th January 2010 regarding the (then) advent of Nationally Significant Infrastructure Projects and a suite of Draft National Planning Statements, including EN-6. The Committee resolved to submit the responses to the consultation questions, as identified in the report appendix, as the Council's corporate response to the consultation.
- 1.12 On a related theme, the January 2025 meeting of Full Council debated a motion of support for the extension of power generation at Heysham 1 & 2 Power stations. Following lengthy debate, the motion was passed by Council. The minutes<sup>5</sup> record both the original motion; the debate that occurred at the meeting, including attempted amendments to the wording, and the final resolution, which reads:

*(That) "The Chief Executive will write to the Secretary of State for Energy and Climate Change, Cat Smith MP and Lizzi Collinge MP, welcoming the generating life extensions to Heysham 1 & 2, and conveying our support for bringing New Nuclear to Heysham and a timeline for this project to achieve, so we can plan for the future engineers and the stability of the Council";*

*"That we publicise these views via our various communication channels"; and,*

*"That a full response to any consultation on New Nuclear is prepared on behalf of the Council by Business Committee at the appropriate time".*

## **2.0 Proposal Details**

- 2.1 The current draft EN-7 consultation ends on 3<sup>rd</sup> April 2025. The document combines a government response to the first-round consultation launched in January 2024<sup>6</sup> and an updated second round of consultation.
- 2.2 The structure of EN-7 is as follows:
- Section 1 provides an introduction to the subject matter;
  - Section 2 sets out the Government's analysis of views and responses to the first-round consultation in greater detail;

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<sup>5</sup> [Agenda item - Motion of support for the extension of power generation at Heysham 1 & 2 Power Stations - Lancaster City Council](#)

<sup>6</sup> [A National Policy Statement for new nuclear power generation: new approach to siting beyond 2025 \(consultation 11<sup>th</sup> January 2024 - 10<sup>th</sup> March 2024\).](#)

- Section 3 comprises the Government's response to the first-round consultation and their updated approach at this second round stage. It explains how the updated approach differs from EN-6, and it describes various elements of the proposed assessment criteria that would inform the case for siting nuclear infrastructure. This includes factors that would influence site selection; technical considerations; Technical Considerations and the discussion of impacts.
- Section 4 of the report provides a summary of the second-round consultation questions; and,
- Section 5 of the report sets out the process and timeline towards 'designation' of EN-7.

2.3 The consultation document asks 10 questions (some with sub-questions). Several of these are optional. Most are focused around response options 'yes, no, unsure, not enough information or other'. Where text boxes are included to allow responses to be explained, these are capped at a maximum of (usually) 150 words.

2.4 Whilst the scope of the consultation is narrow in terms of the implications specifically for Lancaster District, the issue of potential new nuclear generation at Heysham is a continuing theme. Therefore, it is important for the City Council to be cognisant of this when progressing its own Review of the Local Plan and preparing site-specific and topic-specific local planning policies. Local policies will need to align with EN-7 (if it is designated as the new National Policy Statement). Aspirations relating to economic development and the growth of employment opportunities will be key factors, as will environmental considerations and the declared climate emergency. The fact that the Local Plan Review is at the evidence-gathering stage is a helpful alignment in terms of timescales.

2.5 In summary, EN-7 outlines a strategic approach to planning to help navigate the changing nuclear landscape in the UK since EN-6 was designated in 2011. It seeks to:

- Provide for Small and Advanced Modular Reactors, as well as gigawatt-scale nuclear infrastructure;
- Bring nuclear into line with other energy infrastructure and provide applicants with robust criteria for site selection; and,
- Remove deployment deadlines from the planning framework for the delivery of new nuclear.

### **3.0 Details of the Consultation and the Suggested Response**

3.1 A copy of the draft responses to the consultation are set out in Appendix 1 of this report. As highlighted previously, many of the questions are narrow in scope and do not provide the opportunity to provide views beyond the specifics of the questions raised. However, where officers have considered this to be necessary and where there is scope for commentary, officers have added additional text.

3.2 Members of the Local Plan Review Group received a similar report and the same draft responses to the questions (as set out here at Appendix 1) on 18<sup>th</sup> March 2025.

### **4.0 Next Steps**

4.1 In terms of the process and the timeline for moving towards designating the new National Policy Statement for Nuclear Energy Generation EN-7, the key dates are as follows:

<b>Winter 2024-Early 2025 (Current Stage)</b>	Analysis of the January 2024 first round consultation responses and government response. Completed with the publication of current EN-7 consultation document.
<b>Spring 2025</b>	Government analysis of second round consultation responses.
<b>Spring/Summer 2025</b>	Preparation and finalisation of the draft National Policy Statement and government response.
<b>Summer 2025</b>	Government aim to revise the draft National Policy Statement based on parliamentary feedback and will aim to prepare the final version for laying before Parliament.
<b>Autumn 2025</b>	The document will be laid before Parliament.
<b>Late 2025</b>	Final designation and publication by Government.

## 5.0 Options and Options Analysis (including risk assessment)

	<b>Option 1: To respond to the consultation questions</b>	<b>Option 2: To respond to the consultation with other comments</b>	<b>Option 3: To not submit a response to this consultation</b>
<b>Advantages</b>	The views of the Council will be considered by Government when deciding how to proceed.	The views of the Council will be considered by Government when deciding how to proceed.	None
<b>Disadvantages</b>	None	Dependent upon the extent of any additional considerations, there is limited time to submit the consultation response.	The formal opinion of Lancaster City Council would not be provided, and an opportunity to contribute to the consultation would be lost.
<b>Risks</b>	None.	None.	None.

## 6.0 Officer Preferred Option (and comments)

- 6.1 The preferred option is Option 1, to respond to the consultation as drafted following the recent consultation with the Local Plan Review Group.

## 6.0 Conclusion

- 6.1 The consultation closes at midday on 3<sup>rd</sup> April 2025. The Department for Energy Security and Net Zero state that all responses will be summarised and that this

summary will be published on the GOV.UK website.

- 6.2 As previously stated, when the process is complete and EN-7 is published in its final form, this will set out the criteria that developers must meet within their application for Development Consent, including on site assessment and the design of the proposed nuclear infrastructure, providing a robust policy framework to guide decision-making.

## **CONCLUSION OF IMPACT ASSESSMENT**

**(including Health & Safety, Equality & Diversity, Human Rights, Community Safety, Sustainability and Rural Proofing):**

Designated under the Planning Act 2008, National Policy Statements serve as crucial guidance for decision-makers, delineating the necessity for infrastructure and outlining the policy framework for making planning decisions on nationally significant infrastructure projects. Whilst the current national policy statement will be updated as a consequence of the consultation if taken forward, it is considered that the proposals will be assessed by Government and that all duties of consideration regarding any impacts will be appropriately considered by the decision-maker.

## **LEGAL IMPLICATIONS**

There are no legal implications to completing and submitting the consultation response.

## **FINANCIAL IMPLICATIONS**

There are no financial implications at this stage.

## **OTHER RESOURCE IMPLICATIONS, such as Human Resources, Information Services, Property, Open Spaces**

There are no resource implications at this stage.

## **SECTION 151 OFFICER'S COMMENTS**

The Section 151 Officer has been consulted and has no further comments to add.

## **MONITORING OFFICER'S COMMENTS**

The Monitoring Officer has been consulted and has no further comments to add.

## **BACKGROUND PAPERS**

- (i) A National Policy Statement for Nuclear Energy Generation, EN-7: Response and new Consultation (2025)
- (ii) Draft: National Policy Statement for nuclear energy generation (EN-7) (2025)
- (iii) A National Policy Statement for new nuclear power generation: Consultation on

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the new approach to siting beyond 2025 (2024)

- (iv) Planning for new energy infrastructure: revision for National Policy Statements (2023)
- (v) British energy security strategy (2022)
- (vi) National Policy Statement for nuclear power generation (EN-6): Planning guidance for developers of nationally significant nuclear power generation projects (2011)
- (vii) Council Agenda item - Motion of support for the extension of power generation at Heysham 1 & 2 Power Stations - Lancaster City Council (22/01/2025)

## **Appendix 1:**

### Lancaster City Council's draft response to National Policy Statement for Nuclear Energy Generation EN-7 consultation.

**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? Please indicate the extent to which you agree or disagree with the question.**

- Strongly agree
- Agree
- Undecided
- **Disagree**
- Strongly disagree
- Not enough information

**Question 1a (OPTIONAL): If you would like to explain your response, please use the text box (free text, max 150 words).**

**ANSWER:**

While there is flexibility within the existing planning framework, the Council is of the opinion that all nuclear energy generating stations should be located within the Nationally Significant Infrastructure Programme for consistency.

**Question 2: To what extent do you believe the draft National Policy Statement is adequately future proofed to accommodate advancements in nuclear technologies? Please indicate the extent to which you agree or disagree with the question.**

- Strongly agree
- **Agree**
- Undecided
- Disagree
- Strongly disagree
- Not enough information

**Question 2a (OPTIONAL): If you would like to explain your response, please use the text box (free text, 100 words).**

**ANSWER:**

The Council consider the draft statement to be future proofed adequately as it now encompasses all sizes of nuclear installations. We consider that national policy needs to be flexible regarding nuclear energy generation as the sector is rapidly adapting and changing. Policy needs to be able to include and support developments within the industry.

**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**
- No
- Unsure
- Not enough information
- Other

**Question 3a (OPTIONAL): If you would like to explain your response, please use the text box (free text, max 150 words).**

ANSWER:

The Council considers that there should be a separate criterion relating to climate change adaptation and mitigation as it is gaining increased importance at a significant speed. Evacuation routes should additionally be considered for residents in terms of siting.

**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)? Please indicate the extent to which you agree or disagree with the proposal.**

- Strongly agree
- **Agree**
- Undecided
- Disagree
- Strongly disagree
- Not enough information

**Question 4a (OPTIONAL): If you would like to explain your response, please use the text box (free text, max 150 words)**

ANSWER:

Removing the distinction between the terms exclusionary and discretionary does not change anything in terms of substance. Paragraph 3.6.3 states that *“the population density and proximity to military activities criteria must be passed in the manner proposed within EN-7 or a site will be deemed inappropriate for the development of nuclear infrastructure”*. Therefore, LaCC consider that the removal of the distinction between the terms exclusionary and discretionary does not remove the requirement for this criteria to be met. The bar that has to be met has not been lowered by the removal of these terms. Paragraph 1.1.7 (v) sets out how the criteria still need to be met and so separation of the terms of not really needed.

**Question 5: The government currently plans to retain the Semi-Urban Population Density Criterion in EN-7. Please indicate the extent to which you agree or disagree with the inclusion:**

- Strongly agree
- Agree
- **Undecided**
- Disagree
- Strongly disagree
- Not enough information

**Question 5a (OPTIONAL): If you would like to explain your response, please use the text box (free text, 150 words)**

ANSWER:

LaCC consider that the 5-year review of this approach is a sensible way forward to as at present there is only limited existing evidence relating to risk levels of AMRs and SMRs posing a smaller risk than existing nuclear technologies (and therefore potentially being able to be located closer to more densely populated areas).

**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. Please use the text box to answer (max 500 words).**

ANSWER:

The Semi-Urban Population Density Criterion includes an indiscriminate 30km radius for any reactor type, this was clearly established with large reactors in mind and does not seem to fit with the SMRs and AMRs that EN-7 is aiming to better support. An effective method of supporting the increased deployment of safer and smaller reactors would be to apply a proportionate approach to this radius based on the scale of the development and the scale of the risk it poses.

For example, a large 2,000 MW reactor may indeed require a 30km radius, but for an SMR with an output of only 200 MW (10x less) it may be more appropriate to apply a 5km radius instead.

This approach would however require a well justified methodology to be established for determining an appropriate radius on a case-by-case basis.

LCC recommend that the criterion should be kept under review (every 5 years) so that changes can be made to reflect any new technologies or research which demonstrates changes in the risk levels of reactor technologies, including AMRs, SMRs and larger nuclear reactors.

LCC would also like to stress that the safety of residents and community is always critical, and that increasing the Semi-Urban Population Density Criterion indiscriminately, or removing it entirely, could place more of the population at risk.

**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
- **No**
- Unsure
- Not enough information

**Other Question 7a (OPTIONAL): If you would like to explain your response, please use the text box (free text, max 150 words)**

ANSWER:

[Consider that all relevant areas have been highlighted.](#)

**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?**

- Yes
- No
- **Unsure**
- Not enough information
- Other

**Question 8a (OPTIONAL): If you would like to explain your response, please use the text box (free text, max 150 words)**

ANSWER:

[As a Local Authority, not a nuclear developer, the Council cannot provide a detailed response to this question.](#)

**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 (email address preferable) in the text box provided (max 150 words) so that we can seek your views.**

ANSWER:

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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.**

- Member of the general public
- Local community member in the vicinity of potential or existing nuclear installation
- Organisation responsible for/interested in new nuclear development.
- New nuclear development supply chain organisation
- Environmental advocate
- Energy business or industry, professional or expert
- Regulator • Nuclear energy professional or expert
- Academic or researcher
- **Local authority/government representative**
- National government representative
- Non Government Organisation

**Question 10 a (OPTIONAL): Please use the text box below to state any other sectors or interests you represent (free text, max 150 words)**

ANSWER:

Any new nuclear development should be required to plan for future connection to or co-development with heat network delivery. This should be particularly required where new developments are within a reasonable range of a Heat Network Zone.

LaCC are also in agreement with strengthening the wording of the flood risk criterion to better address all types of flood risks.