



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

10 November 2008

Dear Sirs

The English National Park Authorities Association (ENPAA) exists to provide a collective voice for the nine English National Park Authorities. It is governed by the Chairs of the nine Authorities, and this response has been written by officers working within the policies established by the NPAs. However, not all English National Parks are affected by this issue, and those that are differ in the proximity and number of existing or potential nuclear sites to their boundaries. Individual National Park Authorities may, therefore, be submitting their own comments which will relate to their own specific circumstances.

ENPAA does not believe that the protection given to designated areas in the consultation document is sufficient or that the impacts of associated infrastructure are adequately dealt with. Therefore, in answer to question 4 of the consultation document, we do not agree that the proposed exclusionary and discretionary criteria are appropriate. As a result we would like to see:

- criterion 3.1 relating to amenity, cultural heritage and landscape value be made exclusionary, not discretionary, for nationally designated areas to give National Parks real protection from inappropriate development;
- criteria 2.1 and 2.2 for nationally and internationally designated sites for nature conservation also be made exclusionary; and
- criteria 3.2 and 4.3 relating to infrastructure dealt with at the national level and not given the '*flag for local consideration*' status.

English National Park Authorities Association

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Criterion 3.1 - Areas of amenity, cultural heritage and landscape value

Under criterion 3.1 nationally designated areas of amenity, cultural heritage and landscape value are not categorically ruled out from consideration for new nuclear power station sites. In order to fully protect National Parks (and the other nationally designated areas of amenity, cultural heritage and landscape value listed in paragraph 2.124) from developments that might have adverse effects on them criterion 3.1 should be made exclusionary in respect of such areas. While we welcome and appreciate the caveat given in paragraph 2.126 of the consultation paper, we feel that this is not sufficient to give National Parks the protection they warrant as areas of outstanding landscape, cultural heritage and wildlife value. PPS7 (Sustainable Development in Rural Areas) clearly states that nationally designated areas such as National Parks have the highest status of protection in relation to landscape and scenic beauty.

In the consultation document, the '*Guidance to Nominators*' (paragraph 2.127, page 69) says that if a site is nominated that may affect an area falling under criterion 3.1 then the Government will expect the nominator to take into account the views of any statutory bodies responsible for the management of the designated area. An indicative list of such bodies should be given as an appendix to the Strategic Siting Assessment guidance and should include National Park Authorities and the Broads Authority as well as Natural England, English Heritage and the Environment Agency.

Criteria 2.1 and 2.2 – Internationally and nationally designated sites of ecological importance

Under criteria 2.1 and 2.2 nationally or internationally designated sites for nature conservation are not categorically ruled out from consideration for new nuclear power station sites. Paragraph 2.117 contains the same caveat in relation to environmental designations as paragraph 2.126 for areas of amenity, cultural heritage and landscape value. Again, we feel that designated sites for nature conservation, particularly those included in the Natura 2000 list, warrant the highest level of protection from developments that might have adverse effects on them. Criteria 2.1 and 2.2 should be exclusionary.

Criteria 3.2 and 4.3 - Significant infrastructure resources and access to transmission infrastructure

Both criteria 3.2 and 4.3 relate to the infrastructure associated with a new nuclear power station and are given the '*flag for local consideration*' status. This means that ease of access to the national grid and the amount, type and location of infrastructure and resources (such as new/upgraded roads, effects on water bodies and resources, sourcing and delivery methods of building materials, etc) needed to construct and connect a new nuclear plant to the grid will not be considered during the national Strategic Site Assessment (SSA). ENPAA believes such issues must be considered at the strategic level. Also, the cumulative impacts of infrastructure and resource

use may well be overlooked in the national SSA and Strategic Environmental Assessment (SEA) if these issues are left for consideration at the local level.

The issue of siting and scale of associated infrastructure (roads, pylons, transfer stations, etc) for new nuclear power stations is of concern to National Park Authorities as it may adversely affect National Park settings or have direct impacts within National Park boundaries. Infrastructure can be outside of a National Park but still impact on the setting of the area. We expect to see that being explicitly recognised in the final SSA.

Criteria 3.2 and 4.3 should be upgraded to discretionary so that the individual and cumulative impacts of associated infrastructure and impacts on sensitive and designated areas are properly considered at the national level.

Please contact me if you require any further information regarding the issues raised in this letter.

Yours faithfully

A handwritten signature in black ink, appearing to read 'A Brace', with a stylized flourish at the end.

Amanda Brace

Policy Officer