



**RTPI**

mediation of space · making of place

Royal Town Planning Institute  
41 Botolph Lane  
London EC3R 8DL  
Tel +44(0)20 7929 9494  
Fax +44(0)20 7929 9490

Email [online@rtpi.org.uk](mailto:online@rtpi.org.uk)  
Website: [www.rtpi.org.uk](http://www.rtpi.org.uk)

Patron HRH The Prince of Wales KG KT PC GCB  
Registered Charity Number 262865

Sent by email to: [nuclearpolicyframework@dti.gsi.gov.uk](mailto:nuclearpolicyframework@dti.gsi.gov.uk)

Energy Review Team  
Department of Trade and Industry  
1 Victoria Street  
London SW1H 0ET

Dear Sir or Madam

**ROYAL TOWN PLANNING INSTITUTE RESPONSE TO DTI CONSULTATION ON:  
POLICY FRAMEWORK FOR NEW NUCLEAR BUILD**

1. I am pleased to submit the Royal Town Planning Institute (RTPI) response to the DTI consultation on a proposed policy framework for new nuclear build. Our response is limited to questions of how the government should articulate policy, priorities and a 'statement of need' for new nuclear build or indeed other major energy infrastructure, and the relationship that any such articulation should have to the conduct of planning inquiries for individual nuclear power station proposals.
2. The RTPI notes that there is proposed to be a further consultation about the inquiries procedures for new nuclear build proposals and flags that it will participate in that process in more detail, setting out clear views on the appropriate balance between a 'statement of need' and the role of the inquiry at that time.
3. In principle, the RTPI supports the proposition that there should be a clear national 'statement of need' for all energy infrastructure of national significance. (The current 50MW threshold appears a basis on which to identify such projects.) Such a statement should be capable of being a weighty material consideration in the making of a planning decision about any major generation facility. In this regard, it ought to be possible to clarify that future public inquiries into major energy facilities do not normally need to re-address the issues covered in any national 'statement of need'.

4. In such a context, the future public inquiry should address questions of site specific impact. These questions should include the suitability of the site for the proposed use and development, bearing in mind the existing planning policy framework, the social, economic and environmental effects of the site and its surrounds on the proposed use and development and of the proposed use and development on its site and its surrounds. They should also include consideration of the adequacy of any proposed impact mitigation measures.
5. To the extent that the DTI consultation paper proposes this approach, the RTPI broadly supports it.
6. However, the RTPI does not consider that this approach should uniquely apply to new nuclear build. The RTPI has identified more broadly (see for example our response to the Treasury's cross cutting review of infrastructure provision for housing<sup>1</sup>) that there is a need for a national spatial infrastructure investment framework. Questions of energy generation infrastructure need and location should be considered as part of such a framework – including the balance and sustainability of modes of energy generation.
7. To this extent, we do not consider that there should be simply a nuclear 'statement of need' as proposed in the consultation paper. Rather, we consider that there should be an integrated energy generation statement of need. Such an approach would seem to be particularly warranted, having regard to the weight that should be placed on minimising carbon emissions, providing energy supply diversity and security, and the need for a balanced energy generation portfolio to achieve this end.
8. Further, the RTPI does not consider that the consultation undertaken to support the Energy Review should be viewed as providing sufficient basis for the development of a 'statement of need' for nuclear or any other form of generation.
9. A draft statement of need as part of a national spatial infrastructure investment framework for energy infrastructure should be formed and publicised, providing those commenting on it with a sufficient understanding of its role and purpose at the outset of the consultation. It should be made clear that it has a policy standing at least equivalent to that of a Planning Policy Statement (PPS) prepared by the Department for Communities and Local Government. Stakeholders should be involved through an opportunity to comment on a detailed draft, in the same manner as they are involved in the preparation of PPS.
10. On such a basis, the RTPI would be prepared to support the proposition that the 'statement of need' should provide a clear policy framework, supplanting an investigation of need in a planning inquiry. Further, a statement prepared in such a manner would be

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<sup>1</sup> <http://www.rtpi.org.uk/resources/policy-statements/2006/aug/pol20060839.pdf>

more robust and hence more likely to fulfill its authors' intent to ensure that national policy determinations of need do not become the routine subject matter of verbal submissions at inquiries.

11. However, until it is clear that stakeholders have been engaged in the detailed content of a draft 'statement of need' whose intended purpose, weight and standing before a public inquiry is clearly articulated as part of the consultation process, the RTPI considers that such a document should not be used to limit the scope of a public inquiry.
12. The RTPI has considerable expertise in the development of planning policy and project assessment and approvals process for major infrastructure, including access to comparative approaches developed overseas. It would be happy to assist in the further development of the 'statement of need' concept if this would assist the Department.
13. I trust that the above is clear. If you require any further input, please contact the undersigned on 020 7929 9478.

Yours faithfully

  
DIGITALLY SIGNED BY RYND SMITH  
not for unauthorised use

**Rynd Smith**  
**Head of Policy & Practice**