

THE ARCHAEOLOGY FORUM

a grouping of independent bodies concerned with archaeology

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SSA criteria Consultation

Nuclear Unit

Bay 135

Department for Business, Enterprise and Regulatory Reform

1 Victoria Street, London,

SW1H 0ET.

11 November 2008

Dear Sir / Madam,

TOWARDS A NUCLEAR NATIONAL POLICY STATEMENT: RESPONSE TO BERR CONSULTATION ON THE STRATEGIC SITING ASSESSMENT PROCESS AND SITING CRITERIA FOR NEW NUCLEAR POWER STATIONS IN THE UK

The Archaeology Forum (TAF) is a grouping of the key, non-governmental organisations concerned with archaeology in the UK. Its members include the Association of Local Government Archaeological Officers UK, the Council for British Archaeology, the Institute of Conservation, the Institute for Archaeologists, the National Trust, the National Trust for Scotland, Rescue, the Society of Antiquaries of London, the Society of Antiquaries of Scotland, the Standing Conference of Archaeological Unit Managers, and the Society of Museum Archaeologists UK.

TAF is pleased to have the opportunity to contribute to BERR's consultation on the Strategic Siting Assessment process and siting criteria for new nuclear power stations in the UK and responds to the questions raised as follows:

Question 1

Do you agree that, at this time, the SSA should focus only on sites that are nominated as being suitable candidates for deploying new nuclear power stations by the end of 2025? If not, why not?

Yes, provided that

- in the selection of sites at a strategic level, appropriate consideration and due weight has been given to archaeological and other considerations relating to the historic environment

- in assessing any application for consent (and, where appropriate, the terms upon which any application might be granted) appropriate consideration and due weight will be given at a local level to archaeological and other considerations relating to the historic environment.

Question 2

Do you agree that the overall SSA process provides an appropriate mechanism for identifying and assessing those sites which are strategically suitable for the deployment of new nuclear power stations by the end of 2025? If not, how should the process be changed?

Yes, subject to the proviso set out under question 1.

Question 3

Do you have any other comments on the practicalities of the proposed SSA process, such as the timetable for nominations and the duration of the nomination period?

We are concerned that the timetable envisaged for the invitation to nominate and the submission of nominations may leave little time for engagement with local communities. Furthermore, there appears to be no requirement for such engagement by nominators, nor for engagement (as regards the historic environment) with relevant stakeholders or the wider public and we would welcome any attempt more firmly to embed consultation within the process.

Question 4

Do you agree that the proposed exclusionary and discretionary criteria are appropriate for the assessment of a site's suitability at a strategic level? If not, how should the criteria be changed to achieve this objective and, specifically, are there any additional criteria that should also be used? Should the classifications of any of the exclusionary criteria, discretionary criteria, or issues for local consideration be changed?

We would prefer to see discretionary criterion 3.1 expressly embrace SEA objectives 22 and 23 (set out in table 5), so as not to focus exclusively upon designated assets of national and international importance. If, however, it is felt that such an approach is not appropriate at this strategic level, we would remain concerned to see that, as regards the historic environment,

- the phrase '*areas of amenity, cultural heritage and landscape value*' (my italics) does not introduce a size threshold for consideration at a strategic level
- the impact upon all archaeological and other assets (the vast majority of which are undesignated) is given due consideration and weight at some stage prior to the grant of 'in principle' consent for development. (The emphasis often given to the protection of designated remains does not mean that undesignated archaeology cannot be a constraint to development.)

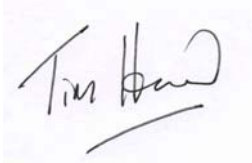
Question 5

Do you agree that the proposed SSA is appropriate to produce a list of strategically suitable sites for the purposes of setting the framework for the Infrastructure Planning Commission's decisions? If not, how should the process be changed to achieve this objective?

Yes, subject to the concerns expressed above and provided that appropriate safeguards are in place to ensure that the historic environment is fully protected.

Thank you for the opportunity to contribute to this consultation and we look forward to contributing further to the production of National Policy Statements.

Yours faithfully,

A handwritten signature in black ink on a light blue background. The signature appears to read 'Tim Howard' in a cursive style.

Tim Howard LLB (Hons), Dip Prof Arch
IfA on behalf of the Archaeology Forum

The Archaeology Forum's members are:

The Association of Local Government Archaeological Officers UK
The Council for British Archaeology
The Institute of Conservation
The Institute of Field Archaeologists
The National Trust
The National Trust for Scotland

Rescue: the British Archaeological Trust
The Society of Antiquaries of London
The Society of Antiquaries of Scotland
The Standing Conference of Archaeological Unit Managers
The Society of Museum Archaeologist