

# The Unite the union response to the Draft National Policy Statement for Nuclear Energy Generation Consultation.



## 1. Introduction

- 1.1. This submission is made by Unite, the UK's largest trade union with over one million members across all sectors of the economy, including manufacturing, financial services, transport, food, agriculture, construction, energy, utilities, information technology, service industries, health, local government and the not-for-profit sector. Unite also organises in the community, enabling those who are not in employment to be part of our union.
- 1.2. Of particular interest to this consultation Unite represents over 32,000 members in the Energy & Utilities sector many of whom are employed directly in energy generation, with over 1.3 million members who are customers in every nation of Great Britain. Unite also represents the construction industry who will have the task of building these facilities going forward and eventually returning the land so you would never know there had been a nuclear power station built on the site.
- 1.3. Unite members can be found in every civil nuclear facility in the UK be that one of the declining number of operational nuclear power stations, involved in the construction of the fuel rods, at the National Nuclear Laboratory or involved with the decommissioning at Nuclear Restoration Services.
- 1.4. Unite has been very critical of the actions of past governments over the planning for energy security in the United Kingdom. Unite has been especially critical of :-
  - delays in planning and construction of new power stations
  - delays securing jobs for UK workers in the fuel rod supply chain.
  - the long delays in the decisions around the stocks of plutonium.
  - of the grid connections and wires to distribute the generational capacity to the rest of the UK.
  - and finally, the plans for high level waste storage.
- 1.5. The lack of a government commitment into a new nuclear programme by past governments has caused there to be a 30-year gap, which caused all the skills and methodologies learnt during the construction of the last of these facilities to be lost to annals of time only to leave future generations with the mammoth task of relearning how to build a new nuclear fuelled station and overcoming the challenge of rediscovering how to pour the huge slabs of concrete that are required for the build for example.
- 1.6. Unite is concerned over the war and peace list of changes to the standard design of one of these stations to comply with UK rules and statutes, that has significantly delayed the construction of Hinkley Point C pushing up its cost. If the past has taught us anything, it has shown that having a series of uniquely designed nuclear power stations to incorporate the latest innovations is not a good idea. This myriads of changes results in retraining costs if individuals relocate, a supply chain that is specific to one location only and an approach to decommissioning that has to solve problems without the ability to pass on those findings to other sites. All of this adds cost, which critics of nuclear use as a weapon to claim that this method of generation is expensive and dangerous, which given the right precautions, is untrue.

**The Unite the union response to the Draft National Policy Statement for Nuclear Energy Generation Consultation.**

- 1.7. Provided there are no more changes with Sizewell C and future stations of this design, not only will these new stations be cheaper to build but far cheaper to decommission at the end of their working life.

## **2. Consultation Questions**

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

Question 1a (OPTIONAL): If you would like to explain your response

- 2.1. Unite Strongly Agrees
- 2.2. Although there are Small Modular Reactor (SMR) designs in operation with capacities as low as 10 Megawatts of electricity (MWe)<sup>1</sup>, these could not be currently classified as a Nationally Significant Infrastructure project.

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

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

- 2.3. Unite Strongly Agrees
- 2.4. Unite feels that once a technology or methodology has been decided upon that design should be followed so that members of staff and equipment can be moved from site to site without the need for adaptations. Doing so provides certainty, and understanding that makes individuals less nervous of their investment in time and money while making savings due to repeatability

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

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

- 2.5. Unite believes Yes - there are specific planning or siting considerations.
- 2.6. The national grid, due to privatisation and lack of investment in infrastructure and people, is currently facing delays of up to 15 to 16 years for the delivery of grid connectivity. Given this Unite recommends the location should ideally have use of existing connections to speed up the process. I would also help if the location of a new nuclear generator was not that far from an existing nuclear facility, even if it is in the process of decommissioning, this would provide the opportunity for the continuation of a career path. There are

---

<sup>1</sup> [HTR-10](#) is a prototype high-temperature gas-cooled, pebble-bed reactor at Tsinghua University in China which was first operated in full power condition in January 2003. This reactor was designed to only produce 10MWe per module.

**The Unite the union response to the Draft National Policy Statement for Nuclear Energy Generation Consultation.**

numerous locations where power stations were once located where the wires to the old switching station are still in existence. Such equipment may need upgrading but it is better than undergoing new public enquiries.

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

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

- 2.7. Unite Disagrees
- 2.8. If the distinction between exclusionary and discretionary was removed all criteria could be deemed as discretionary. Unite can see that if there can be an engineered solution to overcome a planning hurdle, then discretion should be used to examine the options.
- 2.9. Unite welcomes the exclusionary requirements re population density and proximity to military activities criteria and agrees these must be passed in the manner prescribed within EN-7 or a site should be deemed inappropriate.
- 2.10. If there is a planning hurdle which excludes a potential location due to a single barrier then ways to overcome that barrier should be sort first.

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:

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

- 2.11. Unite Strongly Agrees
- 2.12. As highlighted nuclear energy already faces opposition from individuals from outside an area who believe horror stories about the dangers of nuclear without the need to antagonise neighbours too, who may be familiar with nuclear and happy about the benefits it brings to an area. The site has to be semi urban or there will not be places for the workforce to reside in without a significant commute or too close to large populations to give rise to major opposition.

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

- 2.13. Unite feels that if there are revisions to the Semi-Urban Population Density Criterion in the future, are well considered. The changes should not result in large scale population relocations just to ensure that the population in an area is minimised below the required levels or is urbanised when all the workers relocate to the area. Equally the criterion limits should not be relaxed to the extent that a SMR is constructed on a brownfield site or on an industrial estate. Unite also feels that if the site location is too rural there could be lengthy and more risky journeys for the workers to endure before and after their shifts. Statistically country lanes are more dangerous than motorways despite the far higher number of vehicles and higher speed, due to the prevalence of blind bends, agricultural

**The Unite the union response to the Draft National Policy Statement for Nuclear Energy Generation Consultation.**

machinery and other obstacles on the route. Additionally narrow lanes are not best suited to the scale of large industrial construction equipment.

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?

Question 7a (OPTIONAL): If you would like to explain your response, please use the text box

- 2.14. Unite would hope there are no other issues that could arise as all bases appear to be covered.
- 2.15. Given the fact that nuclear power plants withstood Russian shelling in the conflict within Ukraine one would hope that more modern designs could withstand a deliberate attempt at sabotage even with a large cargo aircraft, crashing into the reactor building, from height. Consequently, as long as the new site is not built directly adjacent to the end of a runway, below sea level, above mine workings or some other hazardous locality, which should be automatically excluded, and the site is secured by the Civil Nuclear Constabulary (CNC), we should be safe.
- 2.16. Unite would focus more on the longer-term socioeconomic benefits from having such a large-scale employer in such locations and the long term benefits it brings rather than looking at any negatives.

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?

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

- 2.17. While Unite would like to believe that more information provides more security but, in this instance, given the copious amounts of paperwork that has already been generated on nuclear facilities, Unite is **unsure** of what additional information could be helpful or required.

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.

- 2.18. Unite would like to be kept informed of developments. Our contact details are available at the end of this consultation.

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

**The Unite the union response to the Draft National Policy Statement for Nuclear Energy Generation Consultation.**

- 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**

2.19. Unite the Union is one of the largest non-governmental organisations in the UK and has the interest of both the nuclear industry workforce to consider but also workers in the wider energy sector, wider populous of its members and also the wider trade union movement to consider. Given we represent over 1.3 million members we are also representatives of a large proportion of the UK electorate.

### **3. Conclusion**

- 3.1. Unite continues to be an advocate of nuclear fuelled generation and therefore welcomes plans for a new fleet of stations. This has been something our parent unions have been calling for, for over 30 years. There needs to be a rolling programme of generation capacity provisions, upgrades and enhancements to ensure we don't face the delays that have occurred with Hingley Point C. That said The UK needs to learn the lessons of the past and not tinker with established designs. With repeatability comes cost savings in time and money both during commissioning, operation and eventual decommissioning.
- 3.2. As stated, the UK had the first power station supplying homes and businesses with power from nuclear fuelled generation back in the 1950's so should have been leading the world in this technology. Due to political indecision, the country is currently facing a situation where nuclear power plants are being nursed to continue to generate past their decommissioning date simply because no new sites have been built in over 30 years and those that were faced calls for changes and innovation in design to a level that caused costs to spiral.
- 3.3. The fire at the North Hyde showed if nothing else the need for resilience especially at economically critical infrastructure locations. This needs to include of course nuclear facilities so that there redundancies to cover the redundancies in order to protect the public but also ensure that there is ample generational capacity to meet the needs of the UK populous and industrial requirements following decarbonisation. This should not mean the introduction of competition to supply from too many sites or this could result in a race to the bottom which we can all ill afford.

Simon Coop  
National Officer  
Energy and Utilities  
Unite House  
128 Theobalds Road  
Holborn  
WC1X 8TN

3<sup>rd</sup> April 2025

For further information please contact Colin Potter, Research Officer in Unite the Union.