



RTPI

mediation of space · making of place

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Patron HRH The Prince of Wales KG KT PC GCB

14th May 2009

Online response sent to: <http://www.nuclearpowersiting.decc.gov.uk/signup/>

Dear Sir/Madam,

RESPONSE TO CONSULTATION PAPER: Choosing Sites for New Nuclear Power Stations

The Royal Town Planning Institute is the leading professional body for spatial planners in the United Kingdom. It is a charity with the purpose to develop the art and science of town planning for the benefit of the public as a whole. It has over 22,000 members who serve in government, local government and as advisors in the private sector.

This document responds to the Department of Energy and Climate Change (DECC) consultation on Choosing Sites for New Nuclear Power Stations.

The response has been formed drawing on the expertise of members of the Environmental Planning and Protection Network.

If you require any further assistance, please contact Rebecca Coates, Planning Policy Officer on 020 7929 9466 or email england.policy@rtpi.org.uk.

Yours sincerely,

Rynd Smith
Director Policy and Partnerships

Enc.

Background

The RTPI recognises in principle the need for a Strategic Siting Assessment process (SSA) and the development of siting criteria for new nuclear power stations. The points raised below focus on general considerations emerging from the site nomination process rather than on specific sites, although reference is made to specifics where this would illustrate a wider point.

The views expressed below should not be taken as any indication of general support for or objection to the principle of nuclear power on behalf of the RTPI.

a. Environmental considerations

The RTPI notes that within the nominations there is substantial variation in the detail given with respect to environmental considerations and potential impacts on the proposed sites. Information relating to national and international designations for sites of ecological importance and documentation for areas of amenity, cultural heritage and landscape value is relatively well covered. However overall, little reference is made to non-designated ecological sites, local sites or to key habitats and priority species. It is suggested that more consideration could be given to these aspects as omission renders it difficult to appraise the degree of commitment to managing environmental issues appropriately, including enhancement and/or mitigation scenarios. It also limits the degree to which the emerging national policy statement will be able to provide guidance on environmental management, enhancement and mitigation.

b. Emergency planning

It is important that sufficient consideration is given to both existing and new development adjacent to the proposed sites. The Buncefield accident in 2005 has brought into sharp focus the problems that can occur when development is allowed to take place within the Detailed Emergency Planning Zone (DEPZ) for a major hazardous facility. It has been estimated that there could have been major loss of life within the DEPZ if Buncefield had occurred during working hours. Properties of poor construction e.g. caravan parks offer little protection against radiation. The HSE Website states that 'any development leading to an increase in residential accommodation or likely to cause an influx of non-residential population' [within a DEPZ] must be referred to HSE. For this reason, it will be important to relate selected sites to know and prospective housing and related growth proposals in and emerging through Regional Strategy and LDF processes.

General observations

The RTPI suggests that the process of planning for sites for new nuclear power stations must consider a broad range of options and their implications in an iterative manner. Whilst we acknowledge that the process needs to run according to a timetable and reach to a clear conclusive position with respect to the alternatives under evaluation, options which are rejected at an early stage may need to be reconsidered later if the environmental costs of preferred options are found to be too high. It is important that the options evaluation process does not result in the premature dismissal of options which, but for the consideration of readily available data or apparently viable technologies, could then be appraised with the prospect of delivering less environmentally harmful outcomes at equivalent benefit.

Options, and the project selected, must be thoroughly tested through open and transparent public engagement and debate. Effective stakeholder and public engagement is crucial to project selection, design and support by local communities. The RTPI welcomes the current consultation, but stresses the importance of engaging with local communities at an early stage in the process. Under the Planning Act 2008 and emerging IPC processes, local authorities will have a particularly important role in making local people aware of the issues and how they can identify local impacts and engage in the IPC decision making process. LPAs will require resources for this and for the

requirement of specialist knowledge that will need to be bought in, for which Government support may be required. Consideration should be given to the deployment of developer contributions within a clear policy/probity framework, to enable this work to be done. Planning Aid can also have a role here, enabling community views on impacts to be brought forward via a mechanism that is independent of the developer or indeed local government, but which provides access to professional planning advice.

The relationship between projects and the national, regional and local statutory planning framework both in England and Wales must be clearly articulated. Nuclear projects will be emerging at a time of significant change in the planning systems, both in England and Wales, with a range of National Policy Statements (NPS) in various stages of production. The RTPI takes the strong view that nuclear siting needs to be considered within the framework of an emerging overarching energy NPS and an NPS addressing Electricity Transmission. It is a significant concern that the current siting process appears to pre-commit both of these important policy processes and hence to potentially exclude sites that could have been viable or to include sites that may be less valuable to the programme once the spatial dimensions of the future generation and transmission systems are clearer than at present. The RTPI has previously suggested and suggests again here that the current siting exercise may need to be repeated on a relatively short timescale.

There are a number of other planning documents which are likely to be relevant to the emerging proposals: in Wales, Planning Policy Wales, the Wales Spatial Plan and local development plans; in England, regional spatial strategies and local development frameworks. It is important that, as the project advances, the relationships between the project and all such plans are clearly articulated. While 'lower tier' plans must take national policy into account, it is also important that national projects are aligned as closely as possible with local priorities as expressed in development plans. While local authorities will have the opportunity to comment at the application stage, it is also important that they are closely involved at the earlier stages of project development in order to inform the preparation of their own plans.

Development of this nature requires a great deal in terms of both material and labour resources. For example, it has been suggested that provision will be needed for 8000 construction workers (and their families) over 5 years if two reactors are built at Sellafield. This will impact on the services that the relevant local authority needs to provide (and plan for and, indeed, pay for), such as schools, hospitals, roads, etc. In terms of the material resources required for construction, we consider that in order to accommodate need it may be necessary to build estimates for aggregates volumes and types (and duration period required) into Development Plans, specifically Minerals & Waste Development Frameworks. Information may also be required on the size of loads that would need to be brought in and how, for sourcing and infrastructure planning purposes. Members have also queried the priority that can be given to local sourcing of both construction materials and workforce.

Finally, the RTPI suggests that a strategic overview of the robustness of the National Grid to accommodate extra nuclear connectivity is given consideration. A member has drawn our attention to the fact that in Cumbria, it will be necessary to upgrade (to 400 kV) a powerline ring around the county. This will provide a robust system that can connect either north or south of Sellafield in case of lines being down. However, this will mean upgrading in sensitive areas such as within the Lake District National Park. The upgrade of this ring will also have an impact on the network of the north of England, in terms of substation and powerline upgrades. We understand his situation is not unique to the north of England and believe it requires further consideration. Whilst National Grid and DECC have undertaken significant forward strategic work on the future development of the transmission system, it is not clear how this relates to the siting exercise, again suggesting a need for a more joined up approach in preparing for a nuclear national policy statement.