

Notes from Councillors meeting with ONR Monday 29th October

Present;

Cllr Hodgson (in the chair)

Cllr Howard

Cllr Hawkins

Cllr Last

Cllr Boast

Cllr Sparrow

Cllr Cooper

Cllr Ginger

Cllr Parker

Mr Mike Warnes Office of Nuclear Regulation, on secondment from DECC

Dr Shaun Welsh Office of Nuclear Regulation (ONR)

Mr Graham Saward Joint Emergency Planning Unit (Suffolk) (JEPU)

Mr Andy Osman Joint Emergency Planning Unit (Suffolk)

Mrs Patsy Dobson SCDC Planning Department

There was a wide ranging discussion around the table and many issues raised. The notes might therefore lack flow as I have tried to pick up the items discussed.

1. Mr Warnes explained to the meeting that he was keen to consult with the Town Council to get their views on plans that were currently being formed by ONR on the way in which advises on land use planning applications. The issues of land use planning are now being looked at as a result of the lessons learned from a Boundary Hill public enquiry. All being well, the proposal would be put forward in a paper to ONR senior management in November.
2. Mr Warnes explained that when a new nuclear design is proposed for the UK the Government make a decision on whether it should be developed in remote or more populated semi-urban areas. It was the Government's expectation that these site characteristics would be preserved as far as possible over the lifetime of the power station.
3. At the time they were developed, Sizewell A and Sizewell B were both deemed to require "remote" area siting criteria for demographic assessment. For modern international designs of the type now undergoing Generic Design Assessment the Government's policy is that they can be developed in more populated semi-urban areas. Government policy therefore for the strategic siting assessment for the potential suitability of new reactors, such as Sizewell C, was assessed on the basis of the less restrictive "semi-urban" siting criteria. That criteria was used in 2011 to provide preliminary advice to Suffolk Coastal District Council about a number of proposed housing developments in Leiston as part of their strategic development plans over the next 15-20 years and did not change the conclusions of the assessment for the suitability of the nominated site for Sizewell C.
4. There was a discussion on the way the remote criteria had been monitored since the 1960's and what the situation was now. ONR provided advice in 2007 about the basis for future development control advice as a result of shutting down Sizewell A and operational experience for Sizewell B (as

recorded in the Town Council's minutes for 7 August 2007). These minutes also made reference to the fact that the application of Magnox limits (remote) to Sizewell B could be relaxed; although not recorded, the only relaxation, essentially for the UK means use can now be made of the less restrictive "semi-urban" criteria.

5. Mr Warnes pointed out that decisions based solely on demographic elements did not ensure safety in themselves as they were not that helpful in identifying vulnerable residents or any relevant local conditions that might come into play for the purposes of evacuation (for instance). Safety was maintained by having a detailed emergency plan in place around each facility that required it. This was the responsibility of Suffolk County Council but discharged on a day to day basis by the Suffolk Joint Emergency Planning Unit in conjunction with other local emergency services and the Sizewell site operators, EDF Energy and Magnox Ltd.
6. In terms of land use planning in the future it was anticipated that, when developments were being considered by the planning authority, the local emergency services through the Joint Emergency Planning Unit would be consulted to ensure that the development could be accommodated in emergency plans. This could, for instance, mean that a large development might be permitted but, where emergency plans could not immediately be changed, the development could be given permission in stages (over two to three years say) to match changes to emergency arrangements needed to ensure public safety.
7. Mr Saward explained that the Joint Emergency Planning Unit reviewed the Sizewell Offsite Emergency Plan at least every 3 years and were currently conducting a major review post Fukushima, including planning to consult local communities on proposed changes in the new year. This would include a consultation on the sizes of Emergency Planning Zones. ONR have the responsibility for setting the DEPZ and the current DEPZ around Sizewell is 2.4km based on technical and scientific data. Mr Osman explained that this was one of a number of factors that ONR took into account when setting the size of the DEPZ and the views of the general public were also important to ensure an appropriate area was set that provided public reassurance for safety arrangements. Another area of consideration was alignment with International Atomic Energy Agency guidelines on emergency planning zones and the UK are reviewing the national implementation of these larger areas.
8. The JEPU explained that their remit was to deal with the consequences of an accident; the site operators were the first line of defence in any safety arrangements through safe site operations. EDF were responsible for formulating emergency plans for on site (and, in the future, on the construction site of C) and these will be integrated with the Off Site Plan to ensure they are workable. This will allow JEPU to formulate their plans knowing what actions would be occurring on site and the possible activity and intensity of any evacuation etc. from the site so that the plans would not clash.
9. Some members were worried that the new guidance on land use planning being proposed gave carte blanche to the planning authority to increase population sizes as they wished. It was made clear that ONR could only advise on land use planning applications and had no regulatory powers to prevent a development from going ahead. However, basing advice on whether the emergency plan could adequately accommodate the proposed

development, supported by the views of the emergency planners would present a compelling case. If the planning authority was still minded to grant permission then ONR would consider 'call in' but could also consider enforcement under its regulation of the Radiation Emergency Preparedness and Public Information Regulations (REPIR) 2001. This would seem to be an unlikely event however as one would hope that the local feelings and wishes would allow a resolution well before this stage. The Secretary of State for Communities and Local Government (SoS for CLG) had recently passed judgement on the first 'call in' requested by ONR in 50 years of providing land use planning advice ('Boundary Hall Inquiry'). The SoS decision on the planning balance i.e. community benefits against safety, adjudged that planning decisions should not be based solely on demographic assessment, and that there was no evidence of impact in the off site emergency plan. That decision is the basis for ONR's consideration of future adjustments to the way in which it provides development control advice around nuclear installations.

10. There was a brief discussion on the ongoing Generic Design Assessment for Sizewell C (and Hinkley Point). When this is completed there will be a much clearer idea on the implications for Sizewell Emergency Plans in the future although, with a review every three years (or when triggered by another event [dry fuel store etc.] there was time to look at this in more detail before construction and before going on line. Hinkley was looking at all these aspects and has been for two years. Suffolk will be able to learn a lot from the discussions and methodology being applied in Somerset.

Summary.

Updated guidance from the ONR on the national position regards Land Use Planning will be provided in due course.

The ONR will advise the JEPU on demographic elements and will continue to test the Sizewell emergency plan through exercise to ensure it remains effective.

The Local Planning Authority at Suffolk Coastal DC will continue to advise the JEPU of all developments around Sizewell within the current Inner and Middle Zone; ie out to 4kms.

The current Sizewell off Site Emergency Plan was deemed effective at the last test by ONR in 2011.

The safety case as put forward by the licensee will not change and will remain as rigorous as it currently is and will cover the lifetime of the each station. Regulated by the ONR.