

Objection to Leiston-cum –Sizewell Neighbourhood Plan

I wish to object to the neighbourhood plan on a number of grounds.

Emergency Plan.

Leiston–cum-Sizewell should be treated as a unique case for planning purposes in that it has the site of the only Pressurised water reactor in the UK known as Sizewell B, within the parish of Leiston. This lies alongside the Sizewell A Magnox reactor which is now declared fuel free and from 2016 is not the subject of an emergency plan.

In the past emergency planning would have indicated a need for a cautious approach to development within up to 8kms of the site, as dictated by the Health and Safety Executive. (see previous plan apps for SZC.)

After the Fukushima accident emergency plans were examined by the Office of Nuclear Regulation (ONR) as part of its responsibility under REPPiR for “reasonably foreseeable accidents”. This was adopted after local discussion and approval by the Sizewell site stakeholder group. 4 kms was seen by a majority as a minimum emergency planning zone. This was compared to the 2.4 kms zone used for Sizewell A and B. The town of Leiston and the neighbouring parish of Aldringham were decided to be included in an “enhanced ” detailed emergency planning zone based on IP16 post codes for all 7244 residents within the zone. This in ONRs words was needed to inspire confidence and be in the interest of public safety. (ONRs PAR report refers). **The “enhanced” zone increased the planning zone from 2.4 kms which excluded Leiston town, to 3-4kms which includes Leiston and Aldringham.**

However Government guidelines were then adopted assuming 75% of residents would have self-evacuated prior to declaration of any accident involving an off-site release and declaration of an emergency. This assumption clearly affects the planning for an emergency and the consequent need to constrain growth within the planning zone. Yet this assumption has never to my knowledge been discussed in public and certainly has never been tested. Even so the planning tool used by Suffolk County Council Resilience forum known as the VECTROS plan in 2013 assessed only limited growth in Leiston of 134 units by the year 2027. (Page 23 tech report). This also had taken account of sites under development at Aldeburgh road and Valley road. As far as is known ONR have never seen the Neighbourhood Plan. The Neighbourhood Plan allows for an additional 312 plots over and above the VECTROS plan, plus unknown numbers from other sites and opportunities which may arise during the years of the plan. This is substantially more than any identified need for Leiston or neighbouring villages. At one time it was envisaged Leiston would act as the focus and hub for an identified local need, but this appears now not to be the case. SCDC has also not yet considered an overall assessment of housing need for the whole of the District. Thus there is no evidence that the “need” is properly addressed and certainly no attempt has been made to limit growth to only those already resident within Leiston or the surrounding villages.

Even so the assumption that 75% of residents will have self-evacuated in a perceived emergency at Sizewell is difficult to understand, and it could be argued would only ensure chaos, disruption and potential risk to health as residents and visitors took any route to safety. Routes which could take them into danger. (A planned emergency only uses nominated routes depending on radioactive plume direction). Bearing in mind ONR had already claimed that the plan was in the interest of public safety and confidence this seems a strange assumption. Experience from Fukushima demonstrated some residents were evacuated to areas already contaminated by radiation by the plume of that evolving nuclear disaster.

Sizewell is also unique in emergency planning in the UK context in that it is understood from the industry that Sizewell has a very much faster evolution of serious accident requiring 4 hours response time. This is compared to the 12 hours assumed accident development time of the AGR reactors deployed elsewhere in UK. This may be somewhat mitigated by the emergency response centre built at Leiston and designed to assist most foreseeable accidents within a 4 hour window. However a new EU Directive 2014/87 requires planning for an emergency involving **unforeseen** circumstances. This need to allow for unforeseen was agreed by our regulators as members of *Herca* and *Wenra*. It is also generally accepted by the industry and EDF in particular that this represents the greatest threat to any nuclear power plant. Planning for “unforeseen” would therefore appear to be the norm for delivery of ONRs enhanced emergency plan and may require a very much faster response.

There is no evidence that the suggested emergency planning has ever been assessed by any independent expert. At minimum ONR guidance is needed on the NP and a far greater understanding of how increased development in Leiston impacts on public safety appears essential with or without nuclear new build.

Nuclear New Build

Clearly the envisaged Sizewell C twin reactor development would require thorough investigation into emergency planning. However emergency planning is not generally required to be in place until just before fuel is loaded (and obviously after consent is granted). The impact of construction of SZC on Sizewell B obviously would require consideration. Sizewell is only considered as a potential site within the National Policy statements, there should be no assumption made in the neighbourhood plan that this development project will go ahead either in the time scale of the plan or indeed at all. Increasing evidence suggest that a SZC as proposed and based on an EPR is unaffordable based on the Hinkley C case and alternatives exist, making it unlikely that there is an Imperative reason to build on this site. For this reason SZC should not form the basis of any assumption for the neighbourhood plan, but should be treated as a variation to the plan if consent be granted or at minimum some idea of the constraints posed by SZC should be noted in supplementary guidance. Constraints posed by SZC construction would include potential impact on **flood risk** in Leiston due to loss of flood plain and possible impact of the need to pipe the Leiston river. Potentially risking fluvial flooding and flood risk due to sea level rise. This could have serious impact on sewage and water management within the whole of Leiston. At minimum completion of the SCC flood risk study is needed along with implementation of any improvement to the sewage system before any new development takes place. Further understanding of SZC will possibly impact on Leiston Police Station site and police services, future use of the railway and also future use of Leiston caravan Park, off King Georges Avenue.

Flood risk

Leiston already has exhibited a high risk of flooding due to sewage capacity during flash rainfall throughout the network. The AECOM study into surface water management has not yet been finalised and therefore it could be said that connecting further property to a network already susceptible to flooding is contrary to policy PPS25. No further property should be added to the network until this study is complete and remedial measures undertaken. The potential impact of a SZC on the overall flood management of the town is a major concern which will be exacerbated by sea level rise at Minsmere sluice.

Alternatives

Whereas the NP includes SZC it does not include any policy for renewable power either large scale or community or individual schemes. Despite the fact that the Gabbard and Galloper off shore windfarms are using the parish as a base for substations. The omission of renewables as a policy is difficult to understand as future national and international targets include a far greater proportion of renewables, including some storage *. Nonetheless the potential impact and location of any projects needs to be considered especially in view of any setting in the AONB. There may also be a possibility of creating jobs in the renewable industry. For example it could be argued that part of the Sizewell A site could be used for renewable energy development despite its setting in the AONB since final site clearance is not proposed until well into the 22nd century. However there is no indication in the plan of the impact of decommissioning of Sizewell A or how this will be done. The potential impact of local jobs being lost from Sizewell A needs further study. By 2027 it is anticipated that the site will only have a security force on site. The potential use of the railway for decommissioning also needs an understanding.

An assessment of renewable development potential and the impact of dismantling some of the Sizewell A buildings may also help to decide whether there is a need for a local training centre as part of overall policy for industry.

However there appears to be no assessment of land needed for industry in the NP or any indication of what is available now. I note SCDC are only now assessing the district wide industrial strategy for their Local plan review. It is unfortunate that the professional guidance and expert advice needed for this strategy and any retail and leisure strategy was not available to the producers of the Neighbourhood plan.

Conclusion

I wish to object to the neighbourhood Plan for Leiston on the following grounds.

Emergency planning and failure to assess housing need against a realistic emergency plan, inclusion of Sizewell C, exclusion of Renewable Energy policy. Flood risk to town needs thorough assessment prior to any new building because SCC AECOM flood and sewage assessment programme is still ongoing. Lack of detail on Industrial strategy and potential impact on existing sites. Lack of detail on Retail and leisure existing and potential sites.

References

VECTROS report available from Suffolk County Council Emergency planning officer.

The ONR PAR assessment for the Sizewell Emergency Plan is on ONR website. Extract below.

HERCA and WENRA are on websites.

*Article about alternative policy need as a result of Hinkley review. Attached.

Extract from ONR PAR report

“The increase to the planning area (i.e. an increase in the extent of the previously defined area to include the whole of the town of Leiston and the majority of the adjoining community of Aldringham) does not mean that ONR has identified a greater risk for those living near the site (in fact, ONR is satisfied that the overall risk from the two nuclear sites has reduced); but recognises the factors which ONR judges to be relevant in securing confidence as regards protection of the public during a reasonably foreseeable radiation emergency, the learning that has emerged from global events such as occurred at Fukushima, and the need to review the scope of off-site emergency planning. The report recommends that: [] ONR should notify the Local Authority (Suffolk County Council) of the need to produce an adequate detailed emergency plan for this new and enhanced REPPiR off-site emergency planning area; and that [] The operators (NGL and Magnox Limited) be notified that the REPPiR prior information area, for which they must ensure the appropriate provision of prior information to the public, is enhanced to cover the same area.”

Michael J. Taylor

24th August 2016

Why energy policy needs reconsidering.

Without Hinkley Point C, the potential to have a real and considered
> debate about the future shape of the electricity system has loomed
> into view, writes Bridget Woodman, Course Director, MSc Energy Policy,
> at the University of Exeter. According to Woodman, the UK
> government's decision to delay a final go-ahead on the project makes
> it possible to start debating the sorts of options being considered
> widely around the world, with measures to encourage more flexible,
> smaller-scale, renewable systems incorporating demand-side measures
> and new technologies such as storage. These are extraordinary times
> for energy policy in the UK. After years of resigned acceptance that
> the Hinkley Point C nuclear power station would be built no matter how
> much of a basket case it was, the government has surprised everyone by
> calling a halt to the process until the autumn. Few people argue that
> Hinkley Point C makes sense. The project's budget has grown from
> original estimates of £16 billion to £24.5 billion today. Even this
> might be an underestimate given the experience of cost overruns
> similar reactors under construction in Finland, France and China.
> Putting all of the subsidies in place has required the UK government
> to essentially redesign the electricity market over the last few years
> in an effort to create a situation where investment in a new plant
> looked attractive. Pretty much every major policy design has been
> geared towards creating a perfect environment for Hinkley Point C.
> That's why it's such a surprise to see the government has now
> stepped back – a bit – from the brink. Without Hinkley Point C,
> the potential to have a real and considered debate about the future
> shape of the electricity system has loomed into view. Now is the time
> to start considering the sorts of options being considered widely
> around the world, with measures to encourage more flexible,
> smaller-scale, renewable systems incorporating demand-side measures
> and new technologies such as storage. A system that is the absolute
> antithesis of what Hinkley Point C represents. Suddenly UK energy
> policy has become very exciting indeed.

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> Energy Post 12th Aug 2016

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> <http://www.energypost.eu/hinkley-point-c-delay-exploit-attack-common-sense-energy-policy/>