

**TOWN AND COUNTRY PLANNING ACT 1990 - SECTION 77 AND TOWN  
AND COUNTRY PLANNING (INQUIRIES PROCEDURE) (ENGLAND)  
RULES 2000**

**APPLICATIONS BY LONDON ASHFORD AIRPORT LTD  
SITE AT LONDON ASHFORD AIRPORT LIMITED, LYDD, ROMNEY  
MARSH, TN29 9QL**

## SUMMARY

### **CONSIDERATION OF CIRCULAR 04/00: PLANNING CONTROLS OF HAZARDOUS SUBSTANCES RELATING TO THE PROPOSED DEVELOPMENT OF LYDD AIRPORT (LONDON ASHFORD INTERNATIONAL AIRPORT) TO DUNGENESS NUCLEAR POWER STATIONS**

**Client: LYDD AIRPORT ACTION GROUP (LAAG)**

**Summary of JOHN H LARGE**

**PLANNING INSPECTORATE REFERENCE: APP/L2250/V/10/2131934**

**LPA REFERENCES: Y06/1647/SH and Y06/1648/SH**

**INQUIRY DOCUMENT REFERENCE: LAAG/4/E**

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**CONSIDERATION OF CIRCULAR 04/00: PLANNING CONTROLS OF HAZARDOUS SUBSTANCES RELATING TO THE PROPOSED DEVELOPMENT OF LYDD AIRPORT (LONDON ASHFORD INTERNATIONAL AIRPORT) TO DUNGENESS NUCLEAR POWER STATIONS**

- S1 I am John Large, a Chartered, Consulting Engineer with considerable experience in nuclear matters.
- S2 I am instructed by the *Lydd Airport Action Group* (LAAG) to provide opinion on Government policy on the demographic assessment of nuclear sites, as applied to the Dungeness [nuclear power plants](#) (NPPs) and related to the proposed development of the London Ashford International Airport (LAIA) at Lydd.
- S3 In my main evidence [LAAG/4/D](#) I have considered this matter in terms of:
- S4 i) in which ways and how the proposed development of LAIA would impact on the population characteristics of the Romney Marsh area; and
- S5 ii) if the increase in users of LAIA has any implications for the off-site emergency planning arrangements.
- S6 In these respects:
- S7 **Government's Demographic Siting Policy:** Government requires the siting of hazardous plants, including nuclear power stations (NPPs), to include the passive safeguard of location within an area of acceptably low population.
- S8 This policy, and the requirement for planning authorities to abide with it, are set out in Government Circular [04/00](#), its policy statement of nuclear power [EN6](#), and by undertakings given to the International Convention of Nuclear Safety, via a number of [Compliance Reports](#) that includes specific arrangements to be applied to any proposed development (ie LAIA) near to a licensed nuclear site (ie Dungeness A, Dungeness B).
- S9 The policy requires population assessment not only of new sites under consideration for a new build NPP, but also that the demographic characteristic of existing sites be *re-evaluated* should any significant development be proposed within the general area of an existing NPP.
- S10 In implementation, the Health and Safety Executive (HSE) administers the Government's demographic control policy.
- S11 **Application of the Demographic Siting Criteria to Dungeness:** In application, the HSE Nuclear Installations Inspectorate (NII) fulfils this function by advising the planning authority, here Shepway DC, whether the proposed LAIA development near to the Dungeness NPP sites is consistent with Government policy.
- S12 My understanding is that Shepway DC is required to take this advice into account when considering whether to grant planning applications relating to the proposed development of LAIA. In other words, account of the existing NPP site demographic is a *material consideration* in the planning process.

- S13 **The Dungeness Demographic Control Sites:** I identify the Dungeness A and B NPP sites to be subject to this Government policy and I reason that the remote railhead, at which the intensely radioactive irradiated or spent nuclear fuel is loaded in flasks onto a train for dispatch, should also be subject to demographic control assessment.
- S14 I demonstrate that the Dungeness A and B, are expected to retain some variance of a significant radiation hazard for one hundred or more years into the future – [TABLES 1](#) and [2](#), [CHART 1](#):
- S15 So long as there is a need for spent fuel, either from Dungeness A and/or Dungeness B, to be dispatched to Sellafield then the remote railhead will remain operational, that is until around 2040 if Dungeness B is granted an extended life until 2028 ([CHART A](#)).
- S16 **Phasing LAIA Expansion v NPP Activities:** I show that whatever LAIA expansion scenario is adopted, or indeed comes to fruition over the course of time, there will be an overlapping number of significant radioactive hazards on the Dungeness A and B NPP sites.
- S17 With respect to the opinion of Louise Congdon ([LAA/4/A](#)) [¶5.63 p54] that 500,000ppa could just be achieved by 2024, the Applicant has previously [stated](#) that LAIA would be expected to achieve twice that, operating at 2mppa within ten years [3<sup>rd</sup> slide]. If so, full commercial operations at LAIA could overlap continuing spent fuel activities at Dungeness B NPP and the remote railhead, even if the NPP was not granted any life extension beyond 2018.
- S18 **Application of the Demographic Assessment:** I determine the demographic characteristics for the following conditions, with the point of origin of the population demographic analysis centred on the:
- S19 a) combined [Dungeness A](#) and [B](#) NPP sites; and
- S20 b) the remote [railhead](#).
- S21 And I consider variations in the number of passengers, LAIA employees and airline crews, etc., for the LAIA operating conditions:
- S22 c) 250,000, 500,000 and 2,000,000ppa under normal conditions ([TABLE 1](#)); and
- S23 d) for the above passenger throughputs but where some event results flight cancellations or whatever, giving rise to log jamming of would-be departing passengers and air crews ([TABLE 2](#)).
- S24 Using this information, I calculate the range of Specific Population Factors (SPF) which provides a gauge of the change in the societal risk brought about by the proposed LAIA operations ([TABLE 3](#)).
- S25 Even though I acknowledge that my demographic site assessment analysis should be treated with caution, it is sufficiently robust to demonstrate that the introduction of the proposed operating levels of LAIA has a significant impact on the Dungeness site demographic characteristics.
- S26 Sufficient that is to have warranted material consideration by Shepway DC when first considering the subject planning applications.
- S27 My searching through the planning documentation has not revealed any record that Shepway DC ever referred this matter to the HSE or that, on its part, HSE ever advised Shepway DC specifically that a re-evaluation of the Dungeness A and B site demographics was required. In other words, it seems to me that this important keystone

of nuclear safety never received any attention so, in this respect, the proposed development fails to comply with the clearly set out Government policy that population factors around nuclear licensed sites should be taken into account.

S28 **Impact on the Off-Site Emergency Arrangements:** I also briefly consider the likely impact of the proposed operating levels of LAIA on the response required in a real radiation emergency and I conclude that it will result in:

- more people being put in harm's way in and around a location that will require emergency arrangements and response;
- a larger number of emergency personnel being required to work in potentially hazardous locations for longer periods of time, at risk of higher radiation dose uptake; and
- self-evacuation by the passengers and others stranded at LAIA that might hinder access to emergency services vehicles and personnel, such that it could possibly compromise the effectiveness of the emergency response to the radiation emergency and, in doing so, result in greater overall radiological consequences to all of those at potential exposure to the radiation emergency.

S27 In both demographic and emergency response sections of my main evidence, I make reference to evidence given by senior NII personnel at another Planning Inquiry in which they strongly objected to a small housing development nearby the nuclear licensed site at Aldermaston in Berkshire.

S28 At that Inquiry the NII opposed the development on the grounds of 268 new residents introduced into a domicile population of 15,000. The NII [stated](#) that the (68/5400=) 2% increase introduced by the development was unacceptable because, amongst other things, this “*. . . would introduce a substantial increase in the numbers of people put into harm's way*” [¶14.4(b) p29]. The comparable situation with the proposed LAIA development is that at the projected 2mppa operational level, the introduced aggregate occupancy of the airport of ~2,680 represents about 50% increase over the Lydd domicile population of about 5,800.

S29 **In Conclusion:** Overall, I am of the opinion that the proposed development of the London Ashford International Airport (LAIA) will:

- S30 a) fail to meet clearly expressed Government policy and its international obligations on population limitation around hazardous sites in order to minimise the societal risk to a tolerable level;
- S31 b) increase the number of people potentially placed in harm's way near to the Dungeness A and B nuclear licensed sites;
- S32 c) compromise the effectiveness of any emergency response to a radiation emergency; and
- S33 d) place emergency services personnel and other responders at increased risk of radiation exposure should a radiation incident occur.

S34 Given the facts and opinion that I and the other experts acting for LAAG have presented, taken together with the commonsense notion that it would be folly indeed for such a development to proceed so near to the highly hazardous NPPs, radwastes and continuing radiological activities of Dungeness, the Inquiry should wholly reject this Planning Application.



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