

**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**

**APPLICATION OF THE DEMOGRAPHIC SITING CRITERIA AND OTHER  
RELATED SITE ISSUES TO DUNGENESS A AND B NPPS AND APPLIED TO  
A FUTURE DUNGENESS C NPP**

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

**Statement 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/K**

1 <sup>ST</sup> ISSUE	REVISION N <sup>O</sup>	APPROVED	CURRENT ISSUE DATE
8 FEBRUARY 2010	LAAG-4-K-R11		<b>12 FEBRUARY 2011</b>

This pdf version of [LAAG-4-K](#) contains hyperlinks to other documents shown thus [M3136-A1](#) will display the whole of the paper, report, etc., referred to providing the host computer is internet connected. The printed hard copy of this document does not contain these links or full citation of the source references - access to the [Large & Associates](#) web page displaying the linked documents is direct by entering the Secure Passcode [CZ3136](#) on the [Client Zones](#) tab.

**APPLICATION OF THE DEMOGRAPHIC SITING CRITERIA AND OTHER RELATED SITE ISSUES TO DUNGENESS A AND B NPPS AND TO A FUTURE DUNGENESS C NPP**

1       **QUALIFICATIONS AND EXPERIENCE**

2       I am John H Large of the Gatehouse, 1 Repository Road, Ha Ha Road, London SE18  
3       4BQ.

3       I have given my qualification and experience in [LAAG/4/A](#) [¶4 to 7].

4       **INSTRUCTIONS**

5       On 8 February 2010 Ms Louise Barton, of the Lydd Airport Action Group (LAAG),  
6       asked me to provide advice on information that I had received in response to a  
7       request made under the *Environmental Information Regulations 2004* (EIR).

6       **A)    DEMOGRAPHIC SITING ASSESSMENTS (DSA) – DUNGENESS A & B**

7       In my second statement of evidence ([LAAG/4/D](#)) I noted the Government’s policy to  
8       limit the potential societal radiological consequences arising from the siting of NPPs  
9       [¶28-29 p5]; that the local planning authority (here Shepway DC) is required to take  
10      this into account in considering whether or not to approve planning applications  
11      [¶30- 31 p5]; and that re-assessment of the population factors with the aim to  
12      preserve the general characteristics of the area around a NPP should be applied  
13      throughout the NPP lifecycle, thus requiring re-evaluation of the NPP site and its  
14      environs by the Health and Safety Executive (HSE) [¶32-33 p6] as and when the  
15      need arises.

8       To determine if the requirements of this Government policy had been put in place I  
9       asked both the HSE and Shepway DC for key information:

9       My request to the HSE, [M3136-A5](#) of 11 January 2011, sought for copies of the most  
10      recent DSAs for the Dungeness A, Dungeness B and proposed Dungeness C nuclear  
11      power plants (NPPs).

10      The HSE Nuclear Directorate (ND) stated in its response [2011010117](#) of 8 February  
11      2011 that the DSAs for both Dungeness A and B ‘*were not held by the HSE*’.

11 I take it that ‘*not held by the HSE*’ to mean that the HSE, or its division the Nuclear Installations Inspectorate (NII), had never undertaken a DSA for either Dungeness A or Dungeness B.

12 In my request [M3136-A7](#) to Shepway DC, I asked if it had been approached by or itself had approached the HSE as recommended by the Government Circular [04/00](#).

13 The communication between HSE and Shepway DC relates to, particularly, the requirements of paragraphs A12 to A18 for consultation with the HSE on proposed developments in the vicinity of a hazardous installation, such as the relationship between the proposed development of LAIA in respect to the Dungeness A and B nuclear power plants, and the remote railhead.

14 It is clear from its 8 February 2011 [e-mail reply](#) [item 1] to [M3136-A7](#) that, although Shepway DC issued a [notice](#)<sup>1</sup> to the statutory consultees, it did not specifically draw attention of the HSE to the juxtaposition of LAIA and the Dungeness A and B NPPs (and the remote railhead).

15 Similarly, referring specifically to any re-evaluation of the site population characteristics received from the HSE (or undertaken itself), Shepway DC clearly states that it holds no information relating to any past DSA [item 5].

16 Shepway DC also provided me with an untitled and undated map showing the ‘[consultation zones](#)’<sup>2</sup> extending from the existing NPP sites – these are the consultation zones referred to in the Government Circular [04/00](#) [¶A18 p47]. I have superimposed these zones on a [three-dimensional view](#) of the Romney Marsh area showing the juxtaposition of the Dungeness NPPs and LAIA.

17 LAIA is located in the OUTER zone<sup>3</sup> so its development should have been notified by Shepway DC to the HSE in accord with Government Circular [04/00](#) [¶A12].

---

1 Interestingly, the HSE seems to have been pencilled in to the list of consultees of the [Notice](#), almost as an afterthought and the actual provision of the planning application documents was left to the Applicant’s agents (Indigo Planning) to circulate.

2 I assume that these are the consultation zones determined and advised by the HSE as required by Article 10(1) of the *Town and Country Planning (General Development Procedure) Order 1995* although, that said, I claim to be no expert on planning law.

3 The basis of the boundaries of the three consultation zones best shown by the [three-dimensional view](#) is not at all clear to me. I would have expected the INNER and MIDDLE zones to follow a radial loci because the risk of exposure (and hence the health detriment) is, essentially, determined by a function of distance. Indeed, the pulling in of the MIDDLE zone boundary on the eastern side of the peninsular runs counter to the heightened radiological impact arising from the prevailing south-westerly wind which would carry any releasing radioactive plume in the direction of the airport.

18 **PART A Summary:** I conclude, therefore, that contrary to Government policy and undertakings [¶7 p2] no re-evaluation of the demographic site characteristics was undertaken by the HSE in account of the subject planning applications. It follows that Shepway DC could not have taken account any potential change in the demographic site characteristics in considering whether or not to approve the subject planning applications.

19 **B) DUNGENESS C NPP DEMOGRAPHICS**

20 In its response [2011010117](#) [item c)] the HSE stated that as part of the Government’s Strategic Siting Assessment, HSE ND carried out a demographic assessment for the proposed Dungeness C NPP location.<sup>4</sup> The demographic assessment component forms part of the overall [Site Assessment Report](#) (SAR) recently published by the Department of Energy and Climate Change as the Draft Nuclear National Policy Statement.

21 Of course, because the demographic assessment is not tied to a specific accident or risk envelope [[LAAG/4/D ¶39 p7](#)], the demographic aspects of the Dungeness C site assessment equally apply to the Dungeness A and B NPPs (save that Dungeness C would have been located a little to the West of the existing NPP sites). This means that much of the findings of the Dungeness C [SAR](#) equally apply to Dungeness A and B NPPs.

22 Referring to the Dungeness C [SAR](#) as this equally applies to Dungeness A and, particularly, Dungeness B which is to remain in full operation until at least 2018, possibly until 2028 by which time the LAIA development would be expected to be in full commercial operation. Elements of the SAR, as equally relevant to the existing Dungeness NPPs are:

23 **C1 Demographics:** HSE ND notes that the suitability of the NPP site can be concluded on the basis of the *semi-urban* criteria, although the boxed text [¶A2 p1] notes that

24 “... *a further demographic assessment will be undertaken*”.

---

4 Immediately west of Dungeness B.

25 Since Dungeness A and B NPPs each have not, apparently [¶18 p4], been subject to  
or DSA re-evaluated then much the same applied to these existing NPPs.

26 **D4 Proximity to Civil Aircraft Movements:** The Civil Aviation Authority (CAA)  
expresses concerns about the protection of the NPP against risks from civil aircraft  
movement, noting [p12] that

27 “... *the juxtaposition the airport and {existing} nuclear power station,  
with regard to the future development of each, is clearly an area  
that will need to be examined within the **planning process**”.*

28 Commenting on the influence of potential influence of LAIA and the existing Air  
Exclusion Zone as this related to the Dungeness C development (but equally  
applicable to Dungeness A and B NPPs), the CAA notes [¶2 Box Text p14]

29 “... *Given the potential impact upon London Ashford (Lydd) Airport  
associated operation, the proximity of the nominated {and existing  
NPP} site in respect of the London Ashford (Lydd) Airport  
Aerodrome Traffic Zone (ATZ) and the previous comment relating  
to aerodrome safeguarding it is essential that the **planning process**  
formally establishes the London Ashford (Lydd) Airport position  
related to the proposed development {and existing Dungeness  
NPPs}*”.

my added **highlighting** and {added} interpretation

30 **PART B Summary:** The recent strategic siting assessment undertaken for the  
proposed Dungeness C NPP included a strong dependency that the planning process  
would consider and resolve a number of issues arising from the juxtaposition of the  
NPP and LAIA.

31 This dependency and much the same reservations equally apply to the existing  
Dungeness A and B NPPs and should therefore be included within this Planning  
Inquiry.

32 **In conclusion:** Relating to the proposed development of LAIA, I am of the opinion  
that the information placed before this Planning Inquiry is incomplete in the  
following respects:

33 a) The influence of the proposed LAIA development of the site demographic  
assessment and, hence, the level of societal risk has not been re-evaluated as  
required by Government policy;

- 34           b)    so, it follows that Shepway DC could not have taken account any potential  
change in the demographic site characteristics in considering whether or not  
to approve the subject planning applications; and
- 35           c)    the site assessment undertaken for the proposed Dungeness C, the findings  
of which equally apply to the existing Dungeness NPPs, raises a number of  
issues introduced by the proposed development of LAIA the require to be  
resolved by the planning process.

36           I state here that I confirm that I have made clear which facts and matters referred to in  
this Statement that are within my own knowledge and which are not. Those that are  
within my own knowledge I confirm to be true. The opinions I have expressed represent  
my true and complete professional opinions on the matters to which they refer.



**JOHN H LARGE**  
LARGE & ASSOCIATES  
CONSULTING ENGINEERS, LONDON