

ANNEX A: Letter setting out consultation response to DTI

October 2006

Dear Sir

Policy Framework for New Nuclear Build – Consultation Response

With regard to the consultation on developing a policy framework for new nuclear build we would wish to make the following comments.

(i) Setting a ‘Statement of Need’ for nuclear power in government policy:

This is considered to be an appropriate approach to try and facilitate a more efficient system, provided the opportunity for a full debate on the need and justification for nuclear power is present at the national level.

(ii) Roles and Responsibilities of the Regulators:

The consultation document advocates that the safety, security and radiological impacts of proposals should be the role and responsibility of the appropriate regulators. The consideration of these kinds of impacts is part of a highly regulated process and the Council agree that these would be more appropriately dealt with outside the planning inquiry process.

(iii) The strategic siting of new nuclear build:

It is unclear from the consultation document what form the strategic siting assessment will take and how the public would be engaged in this process.

The document sets out that the siting assessment will identify the criteria for locations where the Government would support proposals for new nuclear power stations. However, it goes on to state that the expectation is that following a strategic siting assessment on which the public has been engaged, planning inquiries should not re-assess the question of whether there are alternative sites for a new nuclear plant, and whether the proposed site is a viable site. The implication is therefore that the siting assessment would identify particular sites, rather than simply setting out the criteria on which potential sites should be judged.

Energy Review: Nuclear Policy Framework
Department of Trade and Industry
1 Victoria Street
London
SW1H 0ET

In terms of involving the public in the siting assessment, the document simply states that work on the siting assessment will begin in early 2007 and that the process will involve public consultation but gives no further information on what form this consultation would take.

In light of this lack of clarity about the form of the strategic siting assessment, and the indication that the principle of development at a particular location would effectively be established before the start of the Inquiry, we would raise concerns about the discussion of alternative sites being completely removed from the local planning process.

(iv) The role of planning inquiries in new nuclear build:

As set out above the Council recognise that some issues, such as the strategic debate about need and health and safety, are more appropriately considered at the national level or as part of the formal regulatory process. In addition, we recognise that the Inspector will always have the authority to open up any matters to the Inquiry should they feel they have not been adequately discussed elsewhere. However, we would raise concerns about the approach put forward for assessing suitable sites for new nuclear build, firstly because the process for carrying out the strategic siting assessment is unclear and secondly, because the form that public involvement in this will take is not fully identified.

Further information needs to be provided, particularly with regard to issue (iii) above, to enable a full discussion to take place on whether the approach proposed in the consultation document will achieve an appropriate balance between efficient decision making and complete public involvement in the examination of the issues.

Further comments:

Notwithstanding the points raised above and the nature of this consultation, the Council wish to register its overall concerns about the development of nuclear power. The Government states that nuclear has a future role, and therefore indicate that this is not the only solution. In light of this the Council wish to emphasise the need for continuing research into and development of alternatives and in particular power from renewable resources.

We appreciate the opportunity to comment on the Government's proposals and wish to be kept informed as the policy approach develops.

Yours faithfully,