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| 1 October 2024 |

To whom it may concern

**ONR Consultation Response: Proposed reforms to the National Planning Policy Framework (NPPF)**

Thank you for the opportunity to comment on the above named consultation. The Office for Nuclear Regulation (ONR) is the UK’s independent nuclear regulator for safety, security and safeguards. Our mission is to protect society by securing safe nuclear operations.

We have a key role within the planning system administering the Government’s policy on the control of population around licensed nuclear sites. We fulfil this function throughout the entire life cycle of the installation through consultation with local authorities. This ensures that until the installation is delicensed, the basis for site licensing is preserved through constraints placed on the surrounding population by controls on future development. This is set out in [National Policy Statement EN-6](https://www.westberks.gov.uk/media/55291/CD12-16-National-Policy-Statement-for-Nuclear-Power-Generation/pdf/CD12.16_National_Policy_Statement_for_Nuclear_Power_Generation.pdf?m=1684855303013).

The Chief Nuclear Inspector’s September 2011 report into the Fukushima Accident made a recommendation relating to the planning control system. Recommendation FR-5: The relevant Government departments in England, Wales and Scotland should examine the adequacy of the existing system of planning controls for commercial and residential developments off the nuclear licensed site.

In the Government’s response to this report in [December 2011](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/48240/3718-gov-response-weightman-final.pdf), it stated that this recommendation would be addressed in the NPPF. The current NPPF addresses this recommendation through paragraph 45, setting out the need to consult ONR, and paragraph 101, setting out the need for decisions to promote public safety.

Our recent experience in the planning system is that these paragraphs are insufficient for ONR to effectively deliver the government’s policy for the control of population around nuclear licensed sites. Decision-makers are not guided as to ONR’s role in the planning system as a result there are instances when our advice has not been acted upon. Examples of these include appeal references APP/X0360/W/22/3304042[[1]](#footnote-1) and APP/W0340/W/22/3312261[[2]](#footnote-2).

Decisions taken against ONR’s advice potentially undermine the safety of the public living in the vicinity of nuclear installations and repeated explanations of ONR’s role in appeals and examinations represents an inefficient use of public funds.

We welcome the opportunity to work with Government to find a solution.

We hope you find this helpful.

Yours sincerely

Sarah Brown

Head of Policy

1. Land west of Kingfisher Grove, Three Mile Cross, Reading, Berkshire, RG7 1LZ [↑](#footnote-ref-1)
2. Land to the rear of The Hollies Nursing Home, Reading Road, Burghfield Common, RG7 3LZ [↑](#footnote-ref-2)