

wmpeconsultation@defra.gov.uk

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13 October 2020

Dear Sir/Madam,

Consultation on the Waste Management Plan for England (WMPE)

NuLeAF (the Nuclear Legacy Advisory Forum) is a Special Interest Group of the Local Government Association (LGA). NuLeAF is directly supported by over 100 local authorities and national park authorities across England and Wales. Our remit encompasses all aspects of the management of the UK's nuclear waste legacy, including interim storage, treatment and disposal. Our primary objectives are:

- to provide a mechanism to identify, where possible, a common, local government viewpoint on nuclear legacy management issues;
- to represent that viewpoint, or the range of views of its member authorities, in discussion with national bodies, including Government, the Nuclear Decommissioning Authority (NDA) and the regulators;
- to seek to influence policy and strategy for nuclear legacy management in the interests of affected communities; and
- to develop the capacity of its member authorities to engage with nuclear legacy management at a local level.

Through our Radioactive Waste Planning Group (RWPG), we provide a forum for land use and waste planning officers to discuss the challenges facing local authorities around the management and disposal of radioactive waste. We are actively engaged with the UK and Welsh Government and the NDA in the development of planning policy for radioactive waste, including recent collaboration in the development of Planning Guidance for the In-Situ disposal of such material.

Comments on the revised Waste Management Plan



We note the statement (page 8) that this Plan does not apply to radioactive waste.

We recognise the division between radioactive waste and other forms of waste in terms of Policy/Strategy and departmental responsibility, and the historical reasons for this. However, we believe that closer links between conventional/hazardous waste and radioactive waste policy must be developed. This is for the following reasons:

- The decommissioning of nuclear sites generates a wide range of waste. This includes materials of varying degrees of radioactivity but also large quantities of hazardous waste (particularly asbestos) and conventional wastes such as building rubble. Effective management requires that all waste arisings are managed in a coherent and integrated way.
- Radioactive waste policy and strategy has progressed significantly in recent years with a greater emphasis on assessing wastes based on risk, the application of Waste Hierarchy and circular economy principles. This is leading to significant diversion away from dedicated radioactive waste management facilities and greater use of landfill sites, super-compaction facilities and incinerators. There is therefore an overlap between the waste infrastructure used by the nuclear industry and other waste management bodies.
- The current review of Decommissioning Policy by BEIS is proposing a change in policy that would allow significant quantities of Low-Level radioactive Waste (LLW) and Very Low Level radioactive Waste (VLLW) to be disposed of in-situ or onsite at NDA sites. Decisions on whether such an option is acceptable should be assessed within the context of wider waste management policy.
- Local Planning Authorities are tasked with the development of integrated plans that address all forms of waste and their local waste infrastructure needs. In many areas of the country this includes the management of radioactive waste, not just from nuclear installations but also from industrial processes, hospitals and research facilities. To ensure that radioactive waste management is properly addressed in local plans, the management of such materials needs to be signposted in Plans and guidance on conventional waste.

We note that MHCLG has been involved in working with BEIS, NDA and NuLeAF in the drafting of Planning Guidance for the In-Situ Disposal of radioactive waste and that this is due for publication shortly. This is a promising sign.



To build on this, we request that Defra use the opportunity presented by the refresh of the WMPE to **establish a clear link between the Plan and guidance of the management and disposal of radioactive wastes.**

I hope this is helpful.

Yours faithfully,

Phil Matthews
Executive Director, NuLeAF