

Date: 1st November 2018

Review of the Joint Lancashire Minerals and Waste Local Plan: Response from NuLeAF

1. Introduction

NuLeAF (the Nuclear Legacy Advisory Forum) is the Local Government Association (LGA) representative body on legacy wastes and decommissioning. We are directly supported by over 100 local authorities and national park authorities across England and Wales and speak for the wider LGA. Both Lancashire County Council and Blackpool Borough Council are members.

Our remit encompasses all aspects of the management of the UK's nuclear waste legacy. 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 the Welsh and UK 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.

Our Radioactive Waste Planning Group is an expert forum for senior land-use and waste planning officers, which aims to support the development of Local Plans and Minerals and Waste Plans. Our members have been closely engaged in discussion around related developments in radioactive waste policy, from Proportionate Regulatory Controls (PRC) and the potential for in-situ disposal of radioactive waste to plans for a Geological Disposal Facility (GDF).

As Executive Director I participate in the NDA's Site Decommissioning and Remediation (SDR) and Integrated Waste Management (IWM) Theme Overview Groups (TOGs).

2. Response to consultation

NuLeAF advocates that all Local Plans and Minerals and Waste Plans, particularly those covering areas which include parts of the UK's nuclear infrastructure, should have policies on decommissioning and radioactive waste management. The absence of clear policies leaves

local authorities and communities less able to influence proposals for the disposal, storage, management or transportation of radioactive materials within their area.

We therefore welcome the inclusion of Policy MW22 on the Landfilling of Low-Level Radioactive Waste (LLW). This gives a clear statement of the local authority position in relation to the Springfield nuclear fuel manufacturing complex, and with regard to the landfilling of LLW within the area.

The supporting text for the policy also references the Heysham nuclear power station. However, given that it is proposed that Heysham 1 closes in 2024 and Heysham 2 closes in 2030, both within the period of this plan, we would advise that a statement is provided on the local authority position regarding the closure and decommissioning of the Heysham site, and the management of waste arising from it.

The policy landscape for nuclear decommissioning and clean up is in the process of significant change, and we feel it would be useful to reference this:

- The Nuclear Decommissioning Authority (NDA) is currently consulting on a Radioactive Waste Strategy which is based on a new and integrated approach to the management of all nuclear wastes.
- Under the banner of 'Proportionate Regulatory Control' the UK Government, NDA and regulators are developing a new framework for the management of low-level radioactive material, which may result in more material being disposed of *in situ* on nuclear licensed sites.
- The NDA is considering plans for the accelerated decommissioning of Magnox sites.
- The government is due to launch the siting process for a Geological Disposal Facility (GDF) for the UK's Higher Activity radioactive wastes in the coming months, and the NDA is also investigating the potential for the use of near surface disposal for some of the inventory.

While Heysham is operated by EDF, the responsibility for its decommissioning and clean up may in future fall to the NDA. Even if this is not the case, the management of the EDF sites will be guided by the wider UK framework for nuclear waste management.

I hope these comments are helpful. I am happy to provide more information if that would be useful.

Yours faithfully,



Philip Matthews
Executive Director