

By email to: PlanningPolicy@southglos.gov.uk

Date: 18th April 2018

Dear Sir or Madam,

South Gloucestershire Local Plan 2018-36

1. Introduction

NuLeAF (the Nuclear Legacy Advisory Forum) is the Local Government Association (LGA) representative body on legacy wastes and decommissioning. NuLeAF is directly supported by over 100 local authorities and national park authorities across England and Wales and speaks for the wider local government community. 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 Government, the 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.

NuLeAF's Radioactive Waste Planning Group (RWPG) draws together planning officers from English and Welsh local authorities with the aim of enhancing local authority capacity and supporting the development of Local Plans and Minerals and Waste Plans with clear policies on radioactive waste.

Through our RWPG, of which South Gloucestershire Council is an active member, we provide opportunities for local authorities to engage with the Nuclear

Decommissioning Authority(NDA), Magnox Ltd, Government and regulators to inform and comment on developing policy, strategy and practice in the management and clean up of existing Magnox sites such as Oldbury.

This has proved useful in encouraging effective engagement with local planning authorities by Magnox, and in raising their understanding of the planning system and the needs of local government and communities. The RWPG also enables exchange of information between local authorities and supports the Duty to Co-operate.

Given our remit, we have focussed our comments on policies **K: Decommissioning of the Oldbury Power Station** and **L: The storage of radioactive waste and other hazardous waste**.

2. Comments on Policies

We welcome the inclusion of clear policies on the Decommissioning of the Oldbury Power Station and on the Storage of Radioactive and other hazardous waste. NuLeAF has worked with our local authority members over recent years to encourage the inclusion of clear policies on these topics. Such policies are of benefit to local government and communities, establishing as they do a framework for decision making and for engagement with the nuclear industry.

K. Decommissioning of the Oldbury Power Station - Question 14

We agree that a decommissioning policy is required, for the reasons provided in the introductory text to Section 2 (above).

We believe that Policy K sets out the main issues and concerns that should be addressed in decommissioning the existing power station and enabling its next planned use. In particular, we welcome the commitment to a planning framework and phased masterplan. As the document recognises, it is important that a strategic approach is taken rather than one based on a piecemeal response to individual planning applications.

The aspirations of the planning framework and phased masterplan (page 89) covers all major elements that would be expected. However, one important issue that the planning framework/masterplan will need to address is the view of the Local Authority on any proposal by Magnox to leave radioactive material in-situ, any ongoing regulatory requirements that this would necessitate, and any impact that such a decision might have on next planned use. This might be appropriate to highlight as a stand-alone issue or as something to be considered using the headings in the proposed framework on page 89.

L. The storage of Radioactive Waste and other hazardous waste

We support the introduction of the new policy on radioactive waste. As noted earlier, we believe it is important that local plans and waste plans include policies on this issue. Many communities across England have radioactive material to manage, but this is particularly the case for those communities with existing or decommissioned nuclear power stations. A policy on radioactive waste will enable effective use of the

planning system to manage local nuclear legacy sites and to engage with the nuclear industry, delivering the best outcome for communities.

The policy is clear. It is welcome that the policy also covers the management of hazardous non-nuclear materials such as asbestos, a major issue for many Magnox stations.

We strongly support the inclusion of a statement that existing or proposed nuclear stations at Oldbury should minimise impacts on the host community and environment, should address the issue around public perception of long term storage of waste, and recognise the need for comprehensive packages of developer contribution and community benefits.

We agree with the key issues that are set out on Page 91. They are rooted in the principles of sustainable waste management and sustainable transport, and seek to minimise negative economic, social or environmental impacts. We believe though that it would be helpful if the policy addressed the issue of in-situ and on-site disposal.

In-situ disposal can be justified as part of sustainable waste management and may be the best and most sustainable management option. However, the benefits and drawbacks of any such decision to leave radioactive material on site will have to be carefully considered against the Council's wider objectives for the Oldbury site and surrounding area.

I hope these comments are helpful.

Yours faithfully,

A handwritten signature in black ink that reads "Philip Matthews". The signature is written in a cursive style with a large initial 'P'.

Philip Matthews

Executive Director

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