

Meeting: Nuleaf Steering Group
Date: 2nd June 2021
Item: 8
Subject: Nuleaf: Response to changes in the policy landscape
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Introduction

At Nuleaf's Annual General Meeting (AGM), held on 10th March 2021, a brief discussion was undertaken on whether Nuleaf should consider altering its remit to reflect developments in the nuclear sector and energy policy landscape. Members expressed a range of views and requested that a formal paper be prepared for the June Steering Group meeting.

This paper explains the context for the discussion and proposes three potential options. It has been informed by one-to-one conversations with a number of Nuleaf members who are also engaged in the work of the New Nuclear Local Authority Group (NNLAG). Additionally, the Nuclear Free Local Authorities (NFLA) were invited to offer their perspective.

Recommendation:

That members consider the options presented and decide whether any changes to Nuleaf's function and remit should be considered further.

1. Background

Nuleaf was created in 2003, when a group of concerned Local Authorities recognised the need for an organisation that could speak for English and Welsh local government on nuclear legacy management.

From its inception Nuleaf has had a focus on nuclear decommissioning and waste management with no position on whether new nuclear power is desirable. This has enabled the group to maintain a broad membership ranging from those local authorities that are actively involved in the development of new nuclear stations, through to those that are opposed to any new nuclear power.

Alongside Nuleaf, two other local government networks on nuclear issues exist. These are:

- **New Nuclear Local Authorities Group (NNLAG)** which shares knowledge, information and best practice regarding new nuclear development.

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- **Nuclear Free Local Authorities (NFLA)** which opposes new nuclear development.

Many members of both NNLAG and NFLA participate in Nuleaf meetings.

2. A changing context

The policy context within which Nuleaf operates has changed significantly since the group was formed. At that time there were no proposals for any new nuclear stations. This enabled a clear focus on decommissioning and remediation. It also meant that the development of new nuclear capacity was not an option that could underpin the clean up and move to next planned use of NDA sites.

That situation has now altered. One large new nuclear site, Hinkley Point C, is under construction and at least one more may be developed. Other related proposals such as Small and Advanced Modular Reactors are on the horizon, while the UK Atomic Energy Authority is seeking a home for a world first prototype fusion power plant. A number of local authorities have received representations from the Nuclear Decommissioning Authority regarding local plan policy changes to promote other development on their sites.

i. National policy and new nuclear

The **2020 Energy White Paper**¹ and the **Ten Point Plan for a Green Industrial Revolution**² underpin the Government's commitments to deliver Carbon Net Zero in the UK by 2050. This will require a complete transformation of the energy system. Government policy is to deliver this by a huge expansion of renewables, storage and hydrogen capacity along with the development of Capture, Usage and Storage (CCUS) for industrial use.

The White Paper also envisages at least a doubling of nuclear capacity. It commits to the development of **Small Modular Reactors (SMRs), Advanced Modular Reactors (AMRs)** and a **fusion** power plant.

Active engagement between Government, developers, the NDA and local authorities is underway. With existing nuclear sites a focus for development, this has direct implications for decommissioning and next planned use. It also affects the waste inventory, leading to the generation of new waste and the potential for existing nuclear material to become fuel in an AMR.

Other policy changes impact on future site plans. In the **Nuclear Sector Deal** the Government aspires to achieve a 20% cut in decommissioning costs but also to grow the sector and enhance skills. The NDA has been challenged by Parliament and the

¹ <https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future>

² <https://www.gov.uk/government/publications/the-ten-point-plan-for-a-green-industrial-revolution/title#point-3-delivering-new-and-advanced-nuclear-power>

Government to deliver social value and sustainability across the estate, as well as to enhance socio-economic support.

Finally, the majority of UK's operational nuclear stations will cease generation over the next 10-15 years, with indications that a number will close ahead of schedule. Decommissioning of these stations may become the responsibility of NDA.

ii. **Carbon Net Zero**

The challenge of Carbon Net Zero has driven the development of energy and infrastructure plans at a local and regional level. These set out a vision based on the integration of different energy generation technologies along with storage, hydrogen and associated supply chain and industrial development. The plans also encompass grid reconfiguration and reinforcement.

Many Nuleaf member local authorities are engaged in this, both directly and through Local Enterprise Partnerships (LEPs) and regional networks. Examples include the Clean Energy Sector Panel in Cumbria, Nuclear South West, the North Wales Growth Deal and Local Energy East (covering Suffolk and adjoining counties).

Through this work, local government involvement in decommissioning is linked to decarbonisation strategies and the wider aspirations of Local Plans. There is potential for the deployment of renewables and new nuclear technologies on NDA sites at an interim stage and as the next planned use.

3. Nuleaf's constitutional position

Nuleaf's **Constitution**³ enables the organisation to engage in new nuclear issues. Paragraph 3 states that Nuleaf's remit '*includes the implications for legacy management of any developments that are likely to impact on that management.*'

Nuleaf has adopted three 'strategic objectives' on the legacy management implications of potential new build. These are to:

- *seek to ensure that proposals for radioactive waste management and decommissioning of new nuclear power stations are appropriate and do not prejudice effective management of the nuclear legacy;*
- *to promote debate and thinking about the ways in which new build could be developed to the benefit of nuclear legacy management and in accordance with the Polluter Pays Principle, including how a more coordinated 'across site' approach could be taken in locations that have or are proposed to have multiple licensed nuclear sites; and*
- *liaise effectively with NNLAG and with local authorities addressing the radioactive waste management implications of new build and provide assistance as appropriate.*

³ <https://www.nuleaf.org.uk/about/constitution/>

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In 2007, Nuleaf published a Briefing Paper on **New Nuclear Build: Implications for Legacy Waste Management**, with another Briefing Paper prepared in 2012 on **Radioactive Waste Management and New Nuclear Power Stations**⁴. More recently, Nuleaf has heard speakers from the NFLA set out their objections to new nuclear and held bespoke meetings on implications of current SMR and fusion programmes for NDA sites.

The organisation also has an agreed Protocol with NNLAG, signed off in 2012. This states that:

Nuleaf and NNLAG will seek to ensure that adequate communication and liaison takes place on issues of mutual interest. The mechanisms are likely to include:

- *the mutual exchange of Nuleaf Steering Group and NNLAG meeting papers*
- *the mutual exchange of working and task group papers*
- *representation at each other's meetings - contact between secretariats as appropriate.*

Any alteration to Nuleaf's current role would require amendment of the constitution. Paragraph 21 of the constitution states that '*This constitution may be amended at an AGM with the agreement of at least two thirds of contributing member authorities.*'

4. Views of Members

To help inform this paper a number of phone discussions were conducted with Elected Members and Officers engaged in both Nuleaf and NNLAG. The NFLA was also invited to offer their views.

Comment was sought on Nuleaf's current role, on the changing policy landscape in the UK, and on whether Nuleaf should engage in the new nuclear arena. A variety of views were expressed, with no consensus emerging. Comments made included the following:

Nuleaf's remit	<ul style="list-style-type: none"> • Nuleaf's great strength is its focus on legacy wastes and its broad membership. We don't want to lose that. • Discussion of SMRs and fusion is unavoidable given the realities on the ground. It would be good if we could involve all perspectives, pro, anti and neutral, within these discussions. • With the closure of the EDF stations the decommissioning side of things will take on a new dimension. Nuleaf would be best to concentrate on that. • Nuleaf should maintain the focus on the NDA and the nuclear legacy. However, we need some flexibility around the edges as we can't avoid the link between decommissioning and proposals for next planned use. New nuclear is a reality and needs to be part of the conversation.
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⁴ <https://www.nuleaf.org.uk/policy-communications/briefing-papers/>

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NNLAG and Nuleaf	<ul style="list-style-type: none"> • NNLAG and Nuleaf are quite different entities. NNLAG is very much led by detailed 'lead and learn' discussions on planning issues. There isn't much merit in combining the two. • NNLAG would benefit from the support of a full-time secretariat and this is something Nuleaf could offer. • NNLAG has concentrated on big new nuclear plants. Its unlikely many more will be built but no-one is really supporting discussion on SMRs or fusion. • There is merit to NNLAG and Nuleaf merging. That would allow an integrated agenda and a full-time secretariat who could support work across all areas of interest. It could reduce duplication and the cost of affiliating to both.
Evolving policy	<ul style="list-style-type: none"> • The changing landscape is a challenge for the industry as well as Nuleaf. NDA is now focused on environmental remediation, with no nuclear generation or reprocessing. At the same time, it is being challenged by BEIS to support the Industrial Strategy and new nuclear development.
Wider agendas	<ul style="list-style-type: none"> • There is merit in having an additional focus on Net Zero Carbon. One thing that Nuleaf could help with is supporting dialogue between local authorities and UK bodies such as National Grid and BEIS. • We should maintain the focus on the NDA estate but engage with wider plans for net zero and energy infrastructure as this is a live issue. • We need to broaden out how we consider nuclear waste. New nuclear waste will be part of the GDF process and some types of advanced reactors may actually use waste as fuel. • Fusion is a very different technology. The siting process is receiving support from many who are opposed to conventional nuclear.

5. Proposed options

Members are invited to comment on and consider three options:

i. No change

The role of Nuleaf would remain the same. It would continue to focus on the issues of nuclear decommissioning and legacy waste management and remain entirely neutral on new nuclear development. The organisation would still be able to hold discussions and events on new nuclear technologies, in line with the current constitution. If supported by members, engagement on issues such as Net Zero Carbon and energy infrastructure plans could be enhanced.

ii. Explore potential for shared secretariat

Further discussion would be instigated on whether there was potential for a joint 'back office' function. Nuleaf and NNLAG would remain separate entities with their own constitution and membership. They would however be supported by a single secretariat. This could enable greater co-ordination of work in overlapping areas. The payment of two separate membership fees may no longer be necessary.

iii. Nuleaf and NNLAG to discuss a merger

The Nuleaf Chair and secretariat would explore the possible creation of a unified local authority body with NNLAG. This would work across all areas of nuclear, from Item 8, Nuleaf: Response to changes I the policy landscape, Steering Group meeting, 2nd June 2021,

proposed new developments to operational stations and legacy sites. It would enable cross-sectoral working but might result in changed perceptions on the neutrality of Nuleaf and could reduce the breadth of opinion within the network.

6. Next steps

At this stage members are invited to offer an indicative view on whether any change in the remit of Nuleaf is required.

If options **ii.** or **iii.** is supported, the Chair and Executive Director will take forward discussions with NNLAG and other relevant parties and the report back to members. A formal decision to amend the Nuleaf Constitution would then be required at an AGM.

If it is decided to maintain the organisation in its current form, the Chair and secretariat could still be requested to develop new areas of work or to enhance meetings and discussions in other ways.