

Philip Matthews
Executive Director

To: localplanconsultation@copeland.gov.uk

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Dear Sir or Madam,

Copeland Local Plan 2021-2038: Consultation response

Nuleaf (the Nuclear Legacy Advisory Forum) is the Local Government Association (LGA) representative body on nuclear 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.

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 UK and Welsh Government, the Nuclear Decommissioning Authority (NDA) and regulators;
- to seek to influence policy and strategy for nuclear legacy management in the interests of affected communities; and
- to develop the capacity of our member authorities to engage with nuclear legacy management at a local level.

Our **Radioactive Waste Planning Group (RWPG)** is an expert forum for senior land-use and waste planning officers, supporting the development of



effective Local Plans and Minerals and Waste Plans. The RWPG has guided the development of Nuleaf's position on the planning aspects of nuclear decommissioning and waste management. More information on our approach is set out in **Briefing Paper 11: Approaches to Radioactive Waste Management in Local Plans**, published in 2020¹.

Copeland Borough Council is an active member of Nuleaf. Cllr. David Moore serves as our Vice-Chair and we have officer participation in our Steering Group and RWPG.

Our members also include Cumbria County Council and the Lake District National Park Authority, both of whom have some planning responsibilities for Copeland. However, this response has been prepared independently by Nuleaf, without consultation with our members in Copeland or elsewhere in Cumbria.

1. 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. Their absence leaves local authorities and communities less able to influence proposals for the management of nuclear legacy sites or the disposal, storage, management or transportation of radioactive materials.

Copeland is central to the Nuclear Decommissioning Authority's (NDA) mission. We therefore welcome the inclusion of a full section on Nuclear Development (Chapter 10) and the references to nuclear elsewhere in the Plan.

Together these policies address the current situation and potential new developments in the nuclear field that may impact Copeland. They are clear, comprehensive, integrated and effective, placing all nuclear operations within a framework designed to deliver positive economic, social and environmental outcomes.

¹ <https://www.nuleaf.org.uk/wp-content/uploads/2020/06/BP11-2020-Radwaste-and-local-plans.pdf>



We do not therefore propose any substantive amendments but offer the following comments. Given our remit, these only address aspects of nuclear policy that have direct or indirect implications for nuclear decommissioning and waste management.

i. Wider policy context

Section 2.2. of the Draft Plan ('Producing the Plan') notes changes to the policy context and circumstances since the adoption of the Core Strategy in 2013. We would suggest that here, or in Chapter 10 on Nuclear Development, significant developments in the context for Nuclear Decommission Authority (NDA) operations are referenced. These include:

- The development by the UK Government (BEIS) of a new Decommissioning and Legacy Waste Management Policy, due for consultation in 2022.
- The publication of the NDA's guiding Strategy 2021-26 (Strategy 4). This provides a clearer commitment to the socio-economic and environmental aspirations for the Sellafield site that the Council has set out.

ii. Geological Disposal Facility (GDF)

Copeland is now host to two Community Partnerships that are taking forward the GDF siting process in the area. We would propose referencing this process within the Plan context and in Chapter 10. It could be helpful to set out criteria to ensure the GDF process progresses in ways that enable the Local Planning Authority to meet its wider objectives.

iii. Community Benefits

The Plan is clear on the need for socio-economic opportunities around decommissioning to be maximised, and for support and investment in skills to help the economy diversify. However, there is no reference to the provision of community benefits to be provided as part of the decommissioning mission. We recognise that such agreements already existing in Copeland, but it may be appropriate to note the need for such agreements to continue and be enhanced in future.



iv. Low Level Waste Repository

There is no reference to the LLWR, another nationally significant element of nuclear infrastructure hosted by Copeland.

I hope these comments are helpful.

Your faithfully,

Phil Matthews
Executive Director