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Dear Sir or Madam,

NDA Social Impact and Communities Strategy – Draft for Consultation

1. The role of Nuleaf

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 speaks on these issues for the wider local government community. We have a remit encompassing 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.



Engagement with local government is critical to the success of the NDA mission and the delivery of this Strategy:

- Local authorities bring a range of expertise in relation to economic development, planning, transportation, education and skills. There is scope to align NDA and local authority strategies and plans to mutual benefit.
- The role of local authorities in economic development will grow significantly with the transfer of the functions of Local Enterprise Partnerships (LEPs) to local authorities from April 2024 and the requirement to establish Economic Growth or Business Boards¹.
- Local Planning Authorities (LPAs) fulfil a regulatory function. Through Nuleaf our members have been able to provide expert advice on land use and waste planning. This helps to deliver the greatest social and community value from decommissioning and waste management. It supports interim use of sites and the move to the next planned use.
- As the Strategy notes, the NDA has a legal duty to consider the impacts of decommissioning on communities under the Energy Act (2004), with further obligations under the Social Value Act (2012).
- Councils are the democratic voice of nuclear communities and as such are of central importance as NDA stakeholders.

Nuleaf is an independent body, guided by our members. We are funded by NDA Group and local authorities and have regularly provided a forum for the NDA to engage with local politicians and officers around socio-economic and environmental issues. We are pleased to see the importance of local authorities to the delivery of this Strategy being acknowledged within the document.

Below we offer comment on each of the sections of the draft Strategy. These have been informed by engagement with our network. A number of our member local authorities, along with the Nuclear Free Local Authorities (NFLA) have drawn on our submission in developing their responses.

To aid clarity, the main proposed changes to the Draft Strategy are highlighted in **bold**.

¹ <https://www.gov.uk/government/publications/guidance-for-local-authorities-delivering-business-representation-and-local-economic-planning-functions/guidance-for-local-authorities-delivering-business-representation-and-local-economic-planning-functions>



2. Introduction and context

We welcome the production by NDA of this Social Value and Communities Strategy and the statement that *'As a group, (NDA is) determined to deliver the maximum positive social impact from the significant public investment made in our mission each year.'*

This commitment aligns with the aspirations of our member local authorities, as set out in Nuleaf's **Policy Statement 5** (Nuclear Decommissioning and Socio-economics)² and **Policy Statement 7** (Community Benefits)³.

We believe that the NDA should adopt a consistent approach to community benefits for nuclear decommissioning and radioactive waste management. This should recognise the impacts on communities of hosting (a) nuclear decommissioning sites (b) long term nuclear waste and Spent Fuel stores (c) radioactive waste management and disposal infrastructure such as landfill sites and (d) radioactive waste left in-situ or on-site. Even sites in long term 'Care and Maintenance', such as Bradwell, impact on their local community and leave a nuclear legacy for many decades. **In line with the proposals set out in our Policy Statement 7⁴ the NDA should establish a framework for the provision of community benefits across all these areas. We would welcome further dialogue with NDA on this.**

We are pleased to see:

- The link made between this Strategy and the NDA's overall Strategy. This is particularly relevant given that the process of preparing the next NDA Strategy (Strategy 5) will soon be underway. Delivery of the 'maximum social value' must be front and centre within Strategy 5, and we will advocate this throughout the Strategy preparation process.
- The commitment to align with the NDA Group Sustainability Strategy and UN Sustainable Development Goals. The delivery of Social Value can only be achieved when it is based on an integrated and balanced

² <http://www.nuleaf.org.uk/wp-content/uploads/2020/02/NuLeAF-Policy-Statement-7-Community-Benefits-final.pdf>

³ <http://www.nuleaf.org.uk/wp-content/uploads/2020/02/NuLeAF-Policy-Statement-7-Community-Benefits-final.pdf>

⁴ <http://www.nuleaf.org.uk/wp-content/uploads/2020/02/NuLeAF-Policy-Statement-7-Community-Benefits-final.pdf>



drive to deliver the best economic, social and environmental outcomes together.

The Strategy highlights other social impact work (page 4) such as on skills, land use, procurement and planning agreements which is '*outside the scope*' of the document. This statement, and others within the Strategy, do lead to a degree of uncertainty about what the exact scope of this Social Value and Communities Strategy is.

The document appears to be a high-level Strategy focussed on the £15million per annum of direct investment in 'community benefits'. At the same time, on page 6 it is stated that the Strategy aims to deliver against 6 Strategic themes which include the supply chain/procurement and links to skills. Social Value through Procurement is also noted on page 7.

It would therefore aid clarity if this document is more explicit about its focus and objectives. It would be helpful if the link between this Strategy and other Strategies, plans and programmes (e.g. on procurement) was more clearly explained diagrammatically or in the Strategy text.

We welcome the commitment that this Social Impact and Communities Strategy will inform those NDA Group operating companies with Social Impact programmes – Sellafield Ltd, Nuclear Restoration Services (NRS) and Nuclear Waste Services (NWS).

We note that the other NDA subsidiaries (Nuclear Transport Solutions (NTS), NDA Properties, Rutherford Indemnities, NDA Archives and Energas) are not covered. **It would be helpful if the reasons for this were explained, for example due to a distinction drawn in the 2004 Act. These businesses have a presence in communities. In some cases, their operations have significant socio-economic impacts such as the operations of NTS in Barrow-in-Furness. The positive social impact of these NDA subsidiaries should be maximised.**

It would also be helpful if the Strategy included a map of all current NDA sites and those due to become the responsibility of the NDA in coming years.



3. Background and analysis

Page 5 highlights the useful studies commissioned on the economic impacts of the NDA Group in West Cumbria, the Magnox sites and Dounreay. It is noted that these helped determine the three priority areas for social impact work, namely North-west Wales, West Cumbria and Caithness and North Sutherland.

These studies concentrate on *economic* impacts. A regular comment from our members is that the emphasis must be broadened to fully encompass the *social* aspects of support for communities, particularly around education and skills.

This issue was highlighted again in discussion with the NDA's Director of Socio-Economics at the Nuleaf Steering Group in September 2023. **We understand from that discussion that the NDA view is that the 2004 Energy Act places some limitations on how these issues may be approached. Despite that, we continue to believe that more integration between the economic and social aspects of Social Impact can be achieved within the context of this Strategy.**

4. Our work

We agree with the six Strategic Themes that underpin this Strategy. **What would be helpful is an explanation of how those themes help drive decisions about the projects that the NDA supports within the three priority areas and elsewhere.**

5. Grant funding

This section states that 'more information on our grant programmes can be found in the detailed guidance for applicants and practitioners which is published alongside this strategy.' **A link to this guidance is not included on the consultation webpage and we are therefore unable to access this.**



6. Social Value through Procurement

It would be helpful **if a link was provided in this section to the NDA's guidance on how it drives Social Value through procurement and the supply chain.**

7. Decision making

It would be useful **if a link was provided in this section to the Cabinet Office guidelines that are referenced, and to the NDA Value Framework.**

8. Outcomes and monitoring

The creation of an accessible set of outcome measures for socio-economic and environmental impacts; and of an effective reporting framework, is something we have been advocating for a number of years.

This section notes some high-level outcome objectives but provides little detail on the metrics that will be used. **We would like to see:**

- **NDA Group engaging with local authorities and other stakeholders to develop a national and site level reporting framework for Social Value and Sustainability. This should include both outcome and impact measures.**
- **Greater information on the commitment to prepare reports on the social impact programmes in terms of how regular these will be and how the information will be disseminated to stakeholders.**

9. Appendix A - Funding

The focus of this strategy is on the £15million annual social impact budget of the NDA. It is useful that the Strategy includes a breakdown of this (Appendix A) between Sellafield, NWS, NRS and the NDA. The explanation of how the NDA centrally retained budget is used is also helpful.



This allocation of £15million amounts to less than 0.5% of the NDA's budget. Independent research commissioned by Nuleaf⁵ found that comparable organisations in other countries spend a greater proportion of their budget on socio-economics (e.g. 2% in Bulgaria). **We would propose that the NDA should commit to a doubling of these funds to £30 million in the first instance and look towards a longer-term target of 2% of budget.**

In addition, our members believe the following issues should be addressed and/or clarified within this Strategy:

- **How the social impact budget will apply to AGR sites that will transition to the NDA following end of generation and defueling. Some will do so within the time frame of this Strategy (Hunterston B, Hinkley Point B and Dungeness B).**
- **If the £15m annual fund will increase over time to support programs in the areas surrounding these AGR sites, a number of which are not currently part of the NDA estate.**
- **If the NDA proposes to update their evidence base to capture information on the expanding NDA estate as a consequence of the AGR fleet transition? This will include existing and also new communities such as Heysham and Hartlepool. An updated evidence base will also be important for areas such as Somerset and Folkestone and Hythe where the cumulative effect of A and B station decommissioning will need to be considered.**

The information on activities around each site is welcome. We are particularly pleased to see clear reference to engagement with local authorities in the development of council plans and strategies.

As noted in the Introduction, the role of local authorities in socio-economic development will increase with the transfer of the functions of Local Enterprise Partnerships (LEPs) to local authorities from April 2024.

⁵ <https://www.nuleaf.org.uk/steering-group-meeting-15th-december-2022/>



Continued dialogue through Nuleaf and directly with individual local authorities will therefore deliver many benefits to both the NDA and local government.

I hope these comments are helpful.

Yours faithfully,

Philip Matthews
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