nuleaf
nuclear legacy
advisory forum

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Call for Evidence: Revisiting the nuclear roadmap

Introduction

Nuleaf (the Nuclear Legacy Advisory Forum) is the Local Government Association's (LGA) representative body on radioactive waste and nuclear decommissioning. We are directly supported by around 100 local authorities and national parks across England and Wales and speak for the wider LGA network on these issues.

We participate in high level government work on strategy and policy and work directly with the Nuclear Decommissioning Authority (NDA) Group, regulators and other stakeholders. Our focus is on the decommissioning of past and current nuclear stations and the management of radioactive waste. However, we engage in discussions around new nuclear power, including SMRs/AMRs and fusion, based on a recognition that:

- New nuclear sites are, in many cases, likely to be located on or adjacent to decommissioning sites. They will therefore have an impact on the pace and approach of current decommissioning work.
- Effective engagement with local government and communities will be essential for all new nuclear development. We can bring learning on this, based on our experience. Nuleaf is also active within international networks on nuclear and can offer insights into how new nuclear development programmes have worked most effectively in different countries.

- New nuclear will leave a decommissioning and waste legacy that will have to be addressed at a future date. It will impact on plans for Geological Disposal and for wider waste management.

Nuleaf has no view on the role of nuclear in the future energy mix or on the most appropriate technologies that should be employed. Some of our member local authorities are actively engaged in the development of new nuclear development in their areas, while other are opposed.

Given our focus, we have limited our comments to certain questions withing the Call for Evidence. We would be happy to provide further comment or to appear before the Committee to expand on these points.

Question 1: Is the Government's policy to reach 24GW by 2050 a credible one?

Given the need to deliver net zero carbon by 2050, and to address the supply and affordability of energy, a radical change in the UK energy system is required. This includes a 50% increase in electricity production by 2035 and potentially a doubling or trebling of electricity requirements by 2050 as we move heat and transport on to low carbon sources.

Government sees nuclear as a significant part of the future energy mix. However, all the UK's current Advanced Gas Cooled Reactors (AGRs) will cease generating by 2030, with the other operational station, Sizewell B, closing in the mid-2030s. Only one new nuclear station, Hinkley C, is currently under construction and we therefore believe there is a major challenge ahead if their vision of 24GW of new nuclear capacity is to be achieved. The UK cannot now be seen to be at the forefront of Small Modular Reactor (SMR) development, either in comparison to other European nations or globally. We offer some comment on the role of the UK Government and Great British Nuclear (GBN) in our response to question 5.

One significant issue facing the UK in transforming its energy system is a shortage of skilled workers. This is compounded by the fact that the same skilled workers required to take forward new nuclear and renewable energy are also needed for nuclear decommissioning, transport infrastructure and the decommissioning of oil and gas facilities.

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A more active approach to the development of skills, and to the STEM agenda, is needed to support this. This should involve industry, universities and colleges, and national and local government. The Government needs to demonstrate it has a coherent plan with an appropriate level of ambition to deliver the change required.

Regarding the creation of new energy infrastructure on or near current nuclear decommissioning sites, the establishment of bespoke development companies could help. An example, promoting non-nuclear redevelopment at the former Chapelcross nuclear station, is the CX programme[1]. Also important will be to set new energy infrastructure into a strategic and integrated local or regional energy plan and into local plans.

At Nuleaf, we have a focus on decommissioning and legacy waste issues. The 'Page 99 Requirement' linking new nuclear facilities and radioactive waste disposal was set out in the 2008 White Paper: *Meeting the Energy Challenge – A White Paper on Nuclear Power*. It states: *'Our policy is that before development consents for new nuclear power stations are granted, the Government will need to be satisfied that effective arrangements exist or will exist to manage and dispose of the waste they will produce.'*

Through the Nuclear Decommissioning Authority (NDA) and Nuclear Waste Services (NWS), a siting process is underway to identify a suitable site and consenting community for a Geological Disposal Facility (GDF). GDFs are internationally recognised by governments, technical experts and scientists as the best solution for the disposal of our most hazardous radioactive waste and we are seeing progress around the world. These programmes are providing valuable insights and informing the GDF siting process in the UK.

The delivery of a GDF is necessary for existing nuclear wastes and to enable any new nuclear programme. Government must maintain a focus on this aspect of the nuclear lifecycle, and the wider decommissioning and waste management mission.

It is also important that the full life cycle costs of nuclear, including decommissioning and waste management, are met for new nuclear developments of all types and scales. CoRWM (Committee on Radioactive

[1] https://www.cxproject.co.uk/

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Waste Management), the UK Government's advisor, has published a paper on the waste implications of Small Modular Reactors (SMRs) and Advanced Modular Reactors (AMRs) that makes a range of recommendations for Government, Great British Nuclear (GB) and Nuclear Waste Services (NWS)[2]. As new nuclear technologies appear, NWS will need funding for R&D to address emerging knowledge needs in relation to these technologies.

Question 5: How well are GB Nuclear, the Office of Nuclear Regulation and DESNZ co-ordinating to deliver new nuclear capacity?

As a network of local authorities, we would make the following observations.

It is understandable that the current Government would wish to review the overall energy mix and the role of nuclear. At present, we are unclear as to the likely role of nuclear in terms of overall target for nuclear generation and the mix of Gigawatt, SMR and AMR technologies within that. Without clarity, the UK's delivery new nuclear capacity will continue to fall behind that of other countries.

As a local authority network, communication from Great British Nuclear (GBN) has been limited to date. We would welcome greater engagement.

We note the proposed changes to nuclear siting outlined in the recent consultation on EN-7. It is suggested that developments of less that 50MW are dealt with under Town and Country Planning (TCPA) rather than as nationally significant infrastructure.

Most Local Planning Authorities (LPAs) do not have the expertise or resources to directly handle an application for a nuclear generating station. Furthermore, public confidence in the development of nuclear projects is at best weak. Micro nuclear reactors would be a new technology, and as such would need to secure public confidence in the first instance.

If smaller scale developments are to be taken forward through the TCPA then this will present challenges to Local Planning Authorities (LPAs). We propose

[2] https://www.gov.uk/government/publications/development-of-small-modular-reactors-smrs-and-advanced-modular-reactors-amrs-corwm-position-paper

that additional planning guidance be developed, in particular to support LPAs who do not currently host nuclear sites. Guidance would also support LPAs to develop policies in local plans to reflect the potential for smaller scale nuclear sites.

Also, we believe that EN-7 does not give adequate prominence to the need for early engagement with host and affected communities and Councils; or the efficiencies to be gained for developers in their planning, design and assessments by understanding host/affected communities and Councils aspirations, policies, objectives, concerns and questions early on.

We also believe that there should be a clear statement in support of a framework for the determination of community benefits around all new nuclear developments. There would be in addition to mitigation/compensation measures

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