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Dear Sir/Madam,

Draft NDA Business Plan 2025-28 Consultation: Response from Nuleaf

1. Introduction

Nuleaf (the Nuclear Legacy Advisory Forum) is the Local Government Association (LGA) representative body on legacy wastes and decommissioning. We are directly supported by around 100 local authorities and national park authorities across England and Wales and speak on these issues for the wider local government community. Nuleaf has 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.



Nuleaf is funded by NDA Group and our member authorities. We sit on the Strategy 5 Development Group (S5DG) and a range of Theme Overview Groups (TOGs) and other fora. Through our meetings we provide an opportunity for the NDA Group to meet and discuss policy, strategy and practice with the local government community.

Local government and Nuleaf are critical to the success of the NDA Group mission:

- Our member councils are the democratic voice of nuclear communities and significant stakeholders for the NDA under the 2004 Energy Act.
- We are important partners in the delivery of the NDA's objectives. Councils bring a wealth of expertise in relation to socio-economics, climate change, sustainable development, biodiversity, planning, transportation, education and skills.
- Local Planning Authorities (LPAs) fulfil a regulatory function. They are enablers of decommissioning and the management of NDA sites including moves to next planned use. Through Nuleaf our members are able to provide expert advice on land use and waste planning. We are actively engaged with NDA Group and Government on issues including Master-planning, Planning Performance Agreements (PPAs), Permitted Development Rights (PDR) and reform of EIA/EIADR.
- Councils have a significant role in the Geological Disposal Facility (GDF) siting process. Without their support the NDA and NWS will not be able to deliver this critically important facility. Nuleaf holds quarterly meetings for the local authorities involved in the siting process and supports the process in a variety of other ways.
- Nuleaf is active in shaping future policy for the NDA. We sit on the UK Government's Radioactive Substances Policy Group (RSPG) and have been engaged in developing the new policy on Nuclear Decommissioning and Radioactive Substances.
- With NDA support, Nuleaf has recently appointed a new officer to act as the Secretariat for SCCORS (Scottish Council Committee on Radioactive Substances). The link between Nuleaf and SCCORS gives us the ability to work across Great Britain on issues of concern, such as Advanced Gas Cooled Reactor (AGR) decommissioning.

Delivering the NDA's sustainability goals requires dialogue with local government at every stage. This will ensure that opportunities to align site level activities with local strategies and plans are not missed. In particular:



- Our members can support the development of suitable interim uses for NDA land.
- Local authority plans, particularly around socio-economics and in relation to Climate Emergency and Nature Emergency/recovery strategies and actions plans can be aligned with those of the NDA Group.

Finally, through local government reorganisation the landscape for stakeholder engagement continues to evolve. Nuleaf can help the NDA Group develop its connections with new host local authorities that arise in future.

Below we offer general comments on the Business Plan and the consultation process, and specific comments on the sections of the draft Plan.

2. The consultation process

The consultation period for the draft Business Plan is short – only 6 weeks including the Easter holiday period. As a member organisation this has presented challenges to us in ensuring that councils are properly engaged in the development of our response. Local authorities often have to share draft responses with a number of Members and staff, and this takes time. We would recommend that a 12 week consultation period is provided for future consultations.

3. Overall Comments

As David Peattie notes in his introduction, 2025 marks the 20th anniversary of the NDA (and indeed Nuleaf) and it is therefore timely to reflect on the progress made over the last two decades, the current context, and the challenges ahead.

The current context presents issues in preparing this Business Plan: NDA Strategy 5 is not finalised but will guide the work of the NDA from 2026-31; while the Spending Review 2025 will not take place until this summer. Below we offer some comments on the overall context for this Plan:



Spending Review 2025

It is clear that the current financial climate creates significant issues for the NDA.

A large number of key activities, across the corporate and site level work of Nuclear Restoration Services (NRS) are caveated with *'the timing and pace of this activity may be impacted by the outcome of the Spending Review 2025 and as such it is subject to change.'* The lack of certainty about so many key NRS activities does reduce the value of the Plan in explaining to stakeholders what work is likely to be achieved by 2028.

This builds on existing uncertainty as to what a Rolling Programme of Decommissioning (RPD) will look like, as the messaging on this has changed over the last few years. **We believe that, once the impacts of the Spending Review are fully assessed, NRS should work with Nuleaf and other stakeholders to explain the forward plan at a national and site level, and engage further around Site Specific Strategies (SSS) and the RPD. We also believe that:**

- **Stakeholders require a clearer explanation as to what is meant by a 'Site Specific Strategy'.**
- **The SSS should incorporate a requirement for sites to produce strategic spatial/masterplans that identify constraints, areas to meet decommissioning needs and opportunities.**

It would also be useful to explain why the uncertainty of the Spending Review appears to be considerably greater on NRS than on other 'pillars' of the NDA where Key Activities appear to be more certain. There is also greater uncertainty around the timeline at some NRS sites than others.

Advanced Gas Cooled Reactor (AGR) Decommissioning

While AGR decommissioning is referenced at various points in the Business Plan, we are surprised that it does not feature more highly given the transfer of two stations (Hinkley B and Hunterston B) to the NDA in 2026, well within the three years that this Plan covered. **More information would be welcome, particularly regarding Hinkley and Hunterston where A and B stations will be co-located, and decommissioning and waste management should be conducted in an integrated way.**



New Nuclear and other land uses

Reference to new nuclear development in the Plan is very limited. While we recognise that the current government is still finalising its plans for the nuclear sector and Great British Nuclear (GBN), **we strongly suggest that the Business Plan should include specific actions in relation to engagement with GBN and host councils and communities, both nationally and within the sections on Oldbury and Wylfa. This is in recognition that there is very likely to be opportunity to reuse/repurpose/redevelop NRS assets, thereby reducing NRS liabilities and potentially realising economic benefits.**

More information on other planned future uses, such as renewable energy or economic development, would also be helpful.

Presentation of the Business Plan

In our response to previous consultations we have proposed a range of measures to enhance the accessibility and presentational aspects of the Plan. We are pleased that many of these have been adopted. We have no further comments regarding the presentation of the report.

Engagement and Reporting

We are unable to find reference to consultation and engagement with Local Authorities or Councils in the draft Business Plan. Engagement with Nuleaf and local authorities is critical to the NDA mission, and **the NDA Business Plan should therefore explicitly recognise liaison with host local authorities to ensure that decommissioning and reuse approaches, where possible, align with local priorities, strategies and policies.**

In our responses to Business Plan consultations over a number of years we have called on the NDA to work with Nuleaf and other stakeholders to **define a set of public-facing targets and outcomes that enable transparent reporting of progress. The NDA's commitment to the workforce, communities and the environment must be supported by effective and accessible engagement and reporting.**

We also note that the NDA has commissioned studies on the operation of the Site Stakeholder Groups (SSGs) and on deliberative democracy. These will complement Nuleaf research on local government engagement (see Section 4) and **it will be important for the NDA Group to work with Nuleaf,**



SSGs and other key stakeholders to help shape an enhanced landscape for engagement in future.

Engagement is, of course, also required in communities that do not have a SSG. At the current time the most notable example is Lincolnshire, due to the presence of a GDF Community Partnership. In future other communities may enter the GDF process or play host to other waste infrastructure. In any such community, **proactive and transparent consultation/engagement should take place.**

4. Our Funding

As noted above, much will hang on Spending Review (SR) 2025, which will be announced this summer. This will provide detail on the level of capital funding over 4 years and resource funding over 3 years.

On page 20 it states that *'The outcome of the Spending Review 2025 may require us to revise the estimated end dates and associated costs for the strategic outcomes.'* It is a weakness of the current system that there is a legal requirement to prepare a 3 year Business Plan regardless of whether there is a clear multi-year financial position upon which to make decisions.

The table on planned income and expenditure 25/26 (p.15) highlights that all parts of NDA will see a flat budget – in essence a decline in funding given rising costs. We recognise that this is already impacting on the forward plans for Sellafield¹ and the wider NDA estate. Our members are concerned about this, and we will continue to lobby the UK Government to provide the best possible settlement for NDA Group in SR25.

We are pleased to see in the first table on page 16 that expenditure on Critical Enablers will increase from £74million to £82 million. We hope and expect that, within this increased total, greater support is provided for engagement with local government and communities. **Nuleaf will publish an in-depth review of local government engagement in the near future. This identifies a range of new areas in which the NDA and Nuleaf could work to enhance engagement, with benefits to the NDA**

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<https://www.bbc.co.uk/news/articles/cm2yvpx8xp1o#:~:text=Nuclear%20site%20warns%20%C2%A32.8bn%20budget%20is%20not%20enough&text=The%20Department%20for%20Energy%20Security,it%20earned%20in%202023%2D2024>



as well as councils and communities. We hope to work with NDA Group to develop our proposals over the next year.

Income this year will decline significantly from 24/25 (p16), largely as a result of a steep fall in reprocessing and fuel management services. **It would helpful, from a stakeholder engagement perspective, to explain the reasons for this decline and the likely future trend.**

It would also be useful to explain what 'NDA-generated revenue' is and why it has more than halved from the previous year, according to the projections.

Finally, there is no reference to funding to support the AGR decommissioning which we assume will be provided from 2026/27. While this does not fall in the current financial year it would be useful to explain the impact on revenue and costs that this is expected to have.

5. Our themes and strategic outcomes

We are surprised that there is no reference under Nuclear Materials (p19) to the recent UK Government decision on Plutonium (Pu) disposition.

6. Work Featuring in 2025-28

We support the linking of strategic approaches and themes to the UN Sustainable Development Goals (SDGs).

Our other comments on this section are:

- In terms of the timelines set out under Integrated Waste Management (IWM), it would be helpful to explain whether these relate to the current NDA estate or also include the management of all wastes from AGR decommissioning.
- No strategic outcomes relate to Critical Enablers (CE). This makes it hard to assess progress towards a broad range of objectives that underpin the NDA mission. Explanation of why strategic outcomes have not been set for CE would be welcome.



- Nuleaf has been working with NRS and NDA on nature recovery and Biodiversity Net Gain (Case study p.26). Local authorities can assist the NDA Group in meeting BNG targets, much of which will have to be achieved off site. There should also be alignment with councils' Local Nature Recovery Strategies.
- We would expect to see reference in the Public and Stakeholder Engagement (PSE) Case Study (p.29) to the recent appointment of a Co-ordinator for SCCORS (Scottish Council Committee on Radioactive Substances). Part funded by NDA, this is a valuable new resource supporting stakeholder engagement in Scotland. The SCCORS Co-ordinator is hosted by Nuleaf.
- Unlike others, the Socio-economic case study (p. 29) does not focus on a specific project but provides a general outline of the NDA's approach. A concrete example of action in supporting the local economy around an NDA site would be preferable.

7. NDA Group key activities

Nuclear Restoration Services (NRS)

As noted earlier, we are surprised by the lack of reference to the handover of the Hinkley Point B and Hunterston B sites to NRS in 2026. We would expect there to be reference to the imminent co-location of A and B sites within the site profiles.

Some further information on the structure of NRS and how it will evolve to incorporate the AGR stations and Vulcan would also be useful.

NDA

A number of Critical Enabler Key Activities offer potential to build further co-operation with local authorities. These include:

- Carbon management plan
- Nature recovery plan
- Support sustainable local economies

We hope to work further with NDA Group on these issues in the coming year.



NDA Properties Ltd.

We note a Key Activity around the 'Review and delivery of progressive environmental stewardship across the portfolio estate, identifying beneficial projects and collaboration in delivering these for community or environmental gain'. **As Nuleaf, we would welcome dialogue about this Activity and the scope for local authorities to be engaged in the delivery of these objectives.**

I hope these comments are helpful.

Yours faithfully,

Philip Matthews
Executive Director