

**Philip Matthews**  
Executive Director

c/o Suffolk County Council  
Endeavour House  
8 Russell Road  
Ipswich, IP1 2BX

0794 920 9126  
philip.matthews@nuleaf.org.uk

Submitted online: [eiadr@onr.gov.uk](mailto:eiadr@onr.gov.uk)

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Dear Sir/Madam,

**Consultation response: EIADR application for consent for Hinkley Point B power station**

**1. Introduction**

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 members include Somerset Council, the host local authority for Hinkley Point B.

Nuleaf's remit encompasses all aspects of the management of the UK's nuclear 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 Welsh and UK 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 its member authorities to engage with nuclear legacy management at a local level.



Nuleaf is active in advising the UK and Welsh Government, the NDA and Nuclear Restoration Services (NRS) on all aspects of strategy, policy and practice in the decommissioning of nuclear facilities and the management of waste. We also engage regularly with ONR, the Environment Agency, and with EDF Energy around their plans to defuel the Advanced Gas Cooled Reactors (AGRs) at Hinkley Point B and elsewhere.

Through Nuleaf's Radioactive Waste Planning Group (RWPG) we provide a link between senior land use and waste planning officers, the NDA and EDF Energy. Our group has considered the issues around EIADR and discussed the current framework with the UK Government and industry. This response is informed by those discussions.

In our response we focus on two critical issues that are of importance for our members. We note that Somerset Council, as the Waste and Minerals Planning Authority, has submitted a more detailed response covering all relevant issues. We very much support their submission.

## **2. Overview**

Hinkley Point B power station, an Advanced Gas-Cooled Reactor (AGR) closed in 2022 after 46 years of electricity generation. It is one of the first AGRs to be decommissioned, following closely behind Hunterston B Power Station in Ayrshire. Dungeness B is also now closed and currently being defueled. It has been agreed that, following defueling, the AGRs will pass to the NDA/NRS for decommissioning.

At Hinkley Point B, the overall strategy is for the enclosing of the reactors and debris vaults in a 'safe store' and then a period of quiescence of approximately 70 years after which Final Site Clearance will be undertaken, releasing the land for future reuse. All plant and buildings not included within the safe store structure will be deconstructed early in the process and the waste arisings managed.



From a local government perspective, we believe the following are of critical importance for the EIADR and for the process of decommissioning and remediating the Hinkley B site and delivering the final Site End State:

- Effective working between EDF and NRS to ensure a seamless transition of the site to the decommissioning phase of operations.
- Integration of A and B site management where of benefit, for example in terms of waste management and storage.
- Close liaison with Somerset Council to ensure that all activity on the site is aligned with Council land use and waste planning policies; and with wider policy around socio-economics and sustainable development.
- Engagement of local authority and community through direct work with the Council and work with the Site Stakeholder Group (SSG)
- Management of waste arisings in the most sustainable ways possible through application of the waste hierarchy and circular economy principles.
- Minimising carbon emissions and delivering the best environmental outcomes in terms of issues including biodiversity, transport and noise.

### **3. Response on specific issues**

We offer comment on two issues:

#### **Waste Planning**

Nuleaf, working through our RWPG, continues to advocate close working between Waste Planning Authorities and site operators to ensure that proposed actions on a site are aligned with planning policies. We are pleased that Somerset Council consider the proposed principles align with local plan policy and also take into account wider principles of sustainable waste management.

It is important that there is active engagement by site operators in the preparation of future Local Plans and Waste Plans to ensure that this alignment continues. It is also important that the operator takes into account Somerset Council policy, for example the Somerset Economic Strategy, as it



develops its proposal for the site end state and considers any opportunities for the interim use of land.

Finally, we are strong advocates for the development of a Masterplan for site under decommissioning, as has been done at Winfrith. Ideally this Masterplan would cover both the A and B sites and also take into consideration operations at the C site. Other tools such as Planning Performance Agreements (PPAs) may also be appropriate.

### **Stakeholder and community engagement**

We note that the SSG will be used to provide updates to the local community, something we welcome. We believe however that the SSG is not the appropriate vehicle for engagement with local authorities, and therefore SSG engagement should run in parallel with direct dialogue with the local authority.

I hope these comments are helpful.

Yours faithfully,

**Philip Matthews**  
Executive Director