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Draft NDA Strategy 2026-31 (Strategy 5): Response to consultation

1. Introduction

1.1 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.



1.2 Engagement with local government is critical to the success of the NDA mission:

- Local authorities bring a range of expertise in relation to economic development, planning, transportation, education and skills. This expertise is required for the delivery of many elements of NDA Strategy.
- Local planning authorities are regulators of NDA operations. Through Nuleaf our members have been able to provide expert advice on land use and waste planning in relation to decommissioning and waste management.
- Councils have a clear and significant role in the Geological Disposal Facility (GDF) siting process. Without their support the NDA and NWS will not be able to deliver this mission-critical facility.
- Councils are the democratic voice of communities and important stakeholders for the NDA as required under the 2004 Energy Act.

1.3 Nuleaf is an independent body, guided by our members. We are funded by NDA, NWS, NRS and local authorities. Our work leads to better outcomes for local authorities and communities, but also helps the NDA Group deliver their mission and meet legal requirements.

1.4 We have been actively engaged in the process of developing Strategy 5. Our Executive Director is a member of the NDA's Strategy 5 Development Group (S5DG) and through this we have provided detailed feedback on the draft Strategy as it has evolved over the past year. We have also contributed through our participation in the NDA's Theme Overview Groups (TOGs) on Critical Enablers (CE), Site Decommissioning and Remediation (SDR) and Integrated Waste Management (IWM).

1.5 Meetings of our Steering Group and Radioactive Waste Planning Group (RWPG) have been used to gain the views of our member local authorities; and in July 2025 we convened a dedicated meeting on draft Strategy 5, involving key NDA staff. Nuleaf members provided comment on our draft response, and participated in the online engagement event organised by NDA on 5th September 2025. This final response is guided by these discussions.

1.6 We are pleased that many of our comments on earlier iterations of the Strategy have been addressed in this version. We offer further feedback below in relation to each of the Consultation Questions, referencing the



Integrated Impact Assessment (IIA). Within our response, the key issues and suggested changes that we propose are set out in **bold** to aid identification.

1.7 Finally, we note that a number of our member local authorities are providing their own responses to this consultation. These offer important insight on both the general themes and the specific issues and opportunities that should be addressed by NDA at a local level. We hope that the final NDA Strategy fully integrates these local perspectives as they are crucial to effective delivery.

2. Strategy 5: Context

2.1 Strategy 5 is the guiding Strategy for the NDA and thus a document of great significance in the decommissioning and clean-up of the UK's legacy nuclear sites.

2.2 The draft Strategy has been published at a time when the implications for the NDA mission of the UK Government's Spending Review 2026-31 are being absorbed. In our response we have highlighted a number of areas where greater clarity on the NDA's plans would be welcome – we hope that this can be provided in the final document.

2.3 The period this Strategy covers will also be a critical one in progressing a range of priorities. These include:

- Action to address the high hazard facilities at Sellafield.
- The creation and explanation of a clear forward plan for each individual site within the Nuclear Restoration Services (NRS) estate, within the general approach outlined here.
- Forward movement in the Geological Disposal Facility (GDF) siting process, particularly in terms of the DSO process and borehole investigations, as well as around community visioning.
- Engagement with local authorities and communities around the storage of waste and the management of radioactive and non-radioactive waste *in situ* or via a range of other facilities.
- The transfer of the AGR sites at Hunterston and Hinkley to NRS; and progress around the passing of the Vulcan facility to NRS/Dounreay.
- Maximising the benefits to nuclear host communities at a time of economic challenge.



- Developing an effective interface between NDA operations and those of EDF and new nuclear providers, along with Great British Energy – Nuclear (GBN-E).

2.4 Across these and all other aspects of NDA operations, the approach adopted must ensure safety, security and wider value for nuclear communities and society as a whole. As the Strategy acknowledges, this is required by the Energy Act 2004 and has been repeatedly emphasised by the UK Government and Parliamentary Committees along with the devolved administrations.

3. Overall comments on the Draft Strategy

3.1 We respond to the specific questions within the consultation document in Sections 4 and 5. Here we offer high level comments.

Accessibility

3.2 Strategy 5 is a more accessible and readable document than previous iterations. The Executive Summary is a useful introduction for the benefit of stakeholders who may not have the time or resources to consider the full suite of documents. The YouTube video and Case Studies are also helpful.

3.3 That said, it can be difficult for local stakeholders or a non-technical reader to easily understand the implications of the Strategy for individual NDA sites, particularly in terms of the 'outside the fence' impacts that communities are most interested in. **We would propose that the NDA produce a separate summary document that outlines how the Strategy will impact on short, medium and long term plans for sites and for key strategic waste programmes. The Mission Progress report is helpful in this regard but again has a more technical focus.**

Vision

3.4 The draft introduces the concept of a 2050 vision, extending beyond the near term timeframe of the Strategy. This is helpful – there is considerable evidence that a 25 year time horizon enables communities to think beyond the short term while still being able to relate to the time frame in terms of their life and that of their children. **We would encourage the NDA Group to use a 2050 vision in its engagement with local authorities and communities where appropriate.**



3.5 It is also important to note that there is **scope for the development of better long term partnerships with local authorities in working towards a 2050 vision. This relates both to land use and waste planning, and areas such as economic development or environmental sustainability where many councils already have long term aspirations and plans in place.**

3.6 In terms of planning, this should include **a commitment to Master-planning (we welcome the mention of this on page 48). A Masterplan would ensure that redevelopment of NDA assets takes place in a coordinated manner in the best interests of finance, environment, socio-economics and the local community.** It would reduce the risk that different parts of the NDA/NRS support developments that help advance some site objectives but act against others, and instead underpin a truly sustainable approach.

Expansion of the NDA Mission

3.7 The period 2026-31 will see the first Advanced Gas Cooled Reactor (AGR) sites pass from EDF to NRS for decommissioning. Strategy 5 also notes the recent agreement with the MOD over the decommissioning of the Vulcan facility. The scope for further growth of the NDA mission is indicated.

3.8 We agree that such agreements can make sense in terms of reducing the overall cost to the UK taxpayer of decommissioning, utilising the NDA Group's expertise and enabling a more integrated approach.

3.9 At the same time, **we would welcome more clarity as to the cost and resource impact of new 'missions' on the NDA Group's operation:**

- In the case of Vulcan, will all the additional costs for the decommissioning and management of waste be met by a transfer of funds from the MOD, or will the NDA bear some of these costs from within its existing, and increasingly stretched budget?
- Regarding AGR decommissioning, will the Nuclear Liabilities Fund (NLF) cover all costs? If not, will the UK Government (or EDF) make up the shortfall?
- How will the envisaged decommissioning of the AGR fleet work alongside that of the Magnox programme? Our members would welcome a clearer explanation of how any delays in AGR



decommissioning might impact on the Magnox programme (or vice versa) and, within an expanded mission, how individual sites are prioritised in terms of funding and staffing.

3.10 It is important that all new missions do not draw funds or staff resources away from existing commitments – as the Strategy states these must complement not compromise the core mission.

4. Consultation Questions: Overview

4.1 We have responded to all of the consultation questions. We note however that some important aspects of developing Strategy are not dealt with directly in the questions, and that there is a lack of detail within Strategy itself. These include:

- New waste storage facilities/options for spent fuel
- Consolidation of Intermediate Level Waste (ILW) from specific NDA sites
- Plans for Near Surface Disposal (NSD).

4.2 These are issues of significant interest to local authorities and communities, and ones where Local Planning Authorities (LPAs) have an important role to play. We have offered comment on these in our response to Question 6.

Role of Nuleaf and Local Government

4.3 As noted, Nuleaf was a member of the S5DG and we have worked over the last year to integrate local government perspectives into this draft.

4.4 The Strategy acknowledges the important role of Nuleaf and SCCORS as the representative bodies for local authorities in England, Wales and Scotland. We are pleased to see our role, and that of local authorities, is recognised as that of a key stakeholder, and delivery partner, across many areas of the strategy, from site stewardship to radioactive waste management and environment to socio-economics.

4.5 We also welcome the recognition of the need to ensure that the NDA has a social licence to operate for nuclear host communities (page 127) - for both the current NDA mission but also emerging new missions.



4.6 Nuleaf has commissioned independent consultancy research, looking at best practice in local engagement within the UK and around the world. This identifies a range of areas where there is scope for enhanced engagement between NDA Group, Nuleaf, SSGs and communities. The research will be published shortly and we will use it as the basis for engagement with the NDA Group. We note some elements of this study under Question 9.

5. Response to consultation questions

***Do you think the introduction to our Draft Strategy provides a clear and accessible overview of our purpose, challenges, and approach?
Is there any other context or information you would find helpful?***

5.1 In general terms the introduction does provide a clear and accessible overview. While the explanation of the Strategic Outcomes is very high level, a link is provided to the Mission Progress report which provides more context.

5.2 That said, **we think the introduction could:**

- **Place more emphasis on the multi-generational aspects of much of the NDA mission, which in some cases stretches to centuries rather decades.**
- **Make specific mention of the process to find a suitable site for a GDF.** This is a critical part of the mission but is not introduced until later in the document on page 30. The timeline on page 18 does not include a date for the planned start of waste emplacement in a GDF.
- **Provide more up to date information on stakeholder views of the benefits of One NDA (p19).** The reference is to a 2022 survey.
- **Introduce the concept of beneficial reuse of sites and assets in support of other government initiatives,** for example in terms of new nuclear or other low carbon or sustainability objectives.



Do you agree that our Strategy embeds sustainability throughout – including alignment with the UN Sustainable Development (SD) Goals and the NDA group sustainability definition? Are there any areas where our approach could be strengthened?

5.3 We strongly support the commitment to integrate Sustainability as a cross-cutting principle that guides strategic decision making.

5.4 The Case Studies are helpful in demonstrating how specific aspects of the NDA's mission are aligned with particular SD Goals but we believe that **Case Study examples of socio-economic support and engagement (supporting SD Goals 3,8, 10,11 and 17) would be helpful**, given these are critical aspects of the NDA's wider sustainable development impacts.

5.5 Strategy 5 should address the challenges that the NDA faces in dealing with situations where actions support certain SD Goals but are detrimental to others. There is reference to the use of the Value Framework but **more clarity on how decisions are made using the Framework would be useful**, particularly examples as to how different SD goals are weighted and prioritised when they appear to be in conflict, and how mitigation measures are employed to offset any negative impacts.

5.6 Section 2.1 outlines the Strategic Themes and topics. This references the 5 Strategic Themes, including Critical Enablers. The section also notes *8. NDA in the UK nuclear enterprise*. We accept that this may not be considered a Strategic Theme or a distinct Critical Enabler. However, at present it seems rather detached from other strategic drivers. **We would propose that more consideration is given as to whether this can be better integrated into the overall strategic framework, given the UK Government's significant ambitions for new nuclear and defence, and their impacts on communities.**



Do you support the approach set out in our group strategy and its focus on collective delivery across the NDA group? Are there any significant activities or opportunities you think we should also highlight?

5.7 This is the first NDA Strategy developed under the One NDA model. Nuleaf supported the ending of the Parent Body Organisation (PBO) model and welcomes a focus on collective delivery – NDA operations across Britain are interlinked and should be considered in an integrated way.

5.8 Our members view is that there is still progress to be made in ensuring that the NDA Group works in an integrated way, **with further steps required to ensure that there is a coherent approach taken across the Group.**

5.9 As already noted, the identification of key actions over the next 25 years (p.30) is useful. We support the strategic priorities listed but would welcome more clarity on some.

5.10 Specifically:

- **Across the document there appears, to an external audience, to be a lack of certainty on the timelines for the decommissioning and delicensing of each Magnox site and of the implications for host communities.** It is stated (p.30) that over the next 25 years *'we expect to have delicensed most of our ex-Magnox reactor sites.'* However, on page. 148 it notes that *'Berkeley, Sizewell A, Wylfa, Oldbury and Bradwell will enter deferral periods before final site clearance'*, the length of these deferrals not being specified. The NDA Business Plan 2025-28 outlines that only Harwell, Hunterston A, Trawsfynydd and Winfrith will be in end states by the 2050s¹.
- **The Roadmap for mission delivery on page 148 does not identify a date by which all or most Magnox sites will be decommissioned.**
- **Very little information is provided, either here or later in the Strategy on the provision of ' a number of new storage facilities'.** We offer more comment on this under Question 6.

¹ [Business plan 2025-28 final single pages.pdf](#)



- It also states that by 2050 '*we expect to have identified a suitable site for a Geological Disposal Facility (GDF)*'. There has been an assumption that a site would be identified well before this, enabling waste emplacement to be underway by 2050 or at least the 2050s.
Again, clarification would be useful.

5.11 We would also make some additional comments on Section 3:

- We recognise the challenge of reporting progress on a 100 year plus mission in relation to a 5 year Strategy. However, **some explanation of how commitments/targets/expectations set out in Strategy 4 have or have not progressed would be welcome, to aid transparency.** As an example, the date for delivery of a GDF appears to be moving further into the future, despite this representing critical infrastructure for the NDA mission and for the UK's new nuclear ambitions.
- We welcome the identification of enabling '*new development opportunities around our sites*' as a strategic priority. **We view this as a vital area for engagement with local government and have made further comment on this in relation to Critical Enablers. Such development opportunities should be developed based on a co-ordinated, master-planning approach and engagement with host local authorities and communities.**
- We support the Mission First approach (p.31) but note that the expansion to that Mission that has taken place (and may continue in future) has to be based on the securing of sufficient additional resources. Otherwise there is a risk to progress at the existing NDA sites.
- We support the 'efficient use of group resources' but note that **the sharing of waste treatment and storage and the repurposing of facilities impacts on host communities and requires their consent** i.e. a social licence to operate.
- We note the reference to Group Action Plans. **Further information on these would be welcome. We believe that there is a need to engage Local Planning Authorities, given their role in determining site decommissioning and waste management/importation.**



Do you think our aspirations for 'Safe Stewardship' – the safe and sustainable management of our estate – are clear and appropriate? What other aspirations should we consider?

5.12 Yes. We particularly welcome the clear commitment (p.37) to engaging with local authorities and communities. We also support the commitments around natural capital and whole life carbon accounting, the preservation of heritage features and engagement with the wider UK nuclear enterprise.

5.13 The estate management plan (p.37) will be an important document and we **(as Nuleaf and local authorities) look forward to engagement around it.** Local authorities can facilitate and deliver the aspirations of this plan, for example around Biodiversity Net Gain (BNG). We are already engaged with NRS at a national and local level on this.

Do you think our objective to optimise the use and reuse of our estate is clear and appropriate? Are there other opportunities we should explore to achieve this goal?

5.14 Yes, though with the following caveats:

- The Strategy states '*Delivering decommissioning at pace across all our estate is unaffordable and unachievable with our available resources and would be inefficient*' (p.39). We accept this, but again highlight our concern that the continued expansion of the NDA estate and mission does not further reduce the ability to decommission the core facilities (Sellafield, Dounreay and the Magnox sites) as rapidly as possible. **More reassurance on this point would be welcome.**
- We agree that '*Delaying decommissioning work because we do not have a final waste solution*' is not an acceptable option. That said, **we do want to see the avoidance of further slippage in the timetable for a GDF and action to ensure that a final decision on the location of this critical facility is made as soon as practicable.**

5.15 We support the logic that underpins the Strategy for Decommissioning (p.39-41) and welcome the statement made (page 148) on the plans for individual sites i.e. that Winfrith, Trawsfynydd, Hunterston A, Harwell, Dungeness A, Hinkley Point A and Chapelcross will undergo continuous



decommissioning under a rolling programme; while Berkeley, Sizewell A, Wylfa, Oldbury and Bradwell will enter deferral periods before final site clearance.

5.16 This provides an element of clarity about the plans for each site that has not been widely understood before. However, our members still have a lack of understanding on the specific timeframes for the decommissioning and remediation of individual sites. **Once the full implications of the 2025-29 Spending Review are understood, there will be a need for engagement with Nuleaf and individual local authorities on the timeframes, the specific plan for each site and the proposed means of integration with any proposals for nuclear new build (see also our related comment under Question 3.)**

5.17 Site End States (SES) are discussed on page 149 of the draft document, stating: *'Alongside site-specific strategies, site end states are being optimised to align with new regulatory guidance..... We aim to agree end-state assumptions for all sites over the next decade'*. Our understanding was that the SES for each site would be agreed sooner than this. **More explanation of this apparent slippage in timetable, how this work is being progressed at site level, and how/when local authorities will be engaged should be provided. This information is important evidence for emerging local plans/economic strategies. As we have noted elsewhere, strategic masterplans are a vital tool for enabling beneficial interim and end uses and coordination/ integration with other governmental priorities such as Nuclear New Build (NNB).**

5.18 The Strategy states (page 47) that the NDA is open to other parties engaging on their estate during the decommissioning process and exploring opportunities for reuse in support of wider government energy priorities. **Our members wish to encourage active engagement on this so that, where there is a significant expanse of open unused land within the Site License footprint and with good connection to National Grid infrastructure, such options are actively explored.** This would assist with national supply of energy generation; use land that is already 'brownfield' and generally away from sensitive receptors; generate some income and potential benefit local communities as additional community benefit measures. This would be of particular benefits at sites such as Bradwell with a few



buildings sited within a larger footprint for a significant period of time before any further decommissioning takes place.

5.19 Draft Strategy 5 makes no reference to Lifetime Plans (LTP) for each site, other than in the Abbreviations (p.178). **Our members are unclear as to the status of LTPs i.e. are they in the process of preparation or have they been succeeded by other documents. An explanation should be provided.**

Do our updated set of IWM principles reflect the nature of our mission and cover the key areas of focus for waste management?

5.20 We support the NDA's overall approach to Integrated Waste Management (IWM), underpinned by the application of the Waste Hierarchy and the SD Goals. We **note plans for the production of an updated Radioactive Waste Strategy (p.72) and look forward to early engagement around this.**

5.21 We agree that it is crucial that '*sustainable and resilient infrastructure*' (p.69) is available for all waste streams and highlight the importance of Local Planning Authorities (LPAs) in assisting in the delivery and maintenance of this infrastructure. Through our Radioactive Waste Planning Group (RWPG), Nuleaf has been active in discussions with the NDA Group around landfill capacity and a range of other mechanisms that help support sustainable waste management. **It is important that this engagement continues.**

5.22 The Strategy outlines an updated set of IWM principles. We support these and welcome the acknowledgement of the need to optimise '*economic, environmental and social value*'. **We propose that the principles also acknowledge the need for '*community consent and acceptance*' of waste management.**

5.23 The NDA Group should consider how their activities affect non-host communities that are impacted by either the transport of and/or the management of radioactive wastes (or example the disposal of Low and Very Low Level Wastes to commercial landfills) and provide mitigation where appropriate.



5.24 Looking forward, **the NDA should engage with relevant government departments (e.g. MHCLG in England) and Waste Planning Authorities (WPAs) to ensure that their needs for radioactive and conventional waste management infrastructure are understood (waste types, quantities and anticipated timelines).**

Storage

5.25 The transfer of radioactive wastes between sites for interim storage is an emotive topic for host communities and those proximate to transport routes. The draft Strategy notes the potential for consolidation of wastes (p.75) and the supporting Integrated Impact Assessment (IAA) report indicates potential changes to the approach to storage facilities previously communicated by the NDA.

5.26 It is unclear what the outcomes of any review of storage may be and the extent to which this will be a departure from that set out previously in Strategy III (published in 2016) and its supporting evidence². If the NDA is considering revising the regional approach to Interim Storage Facilities (ISF's) set out in the 2015 report, **this should be set out clearly in the draft.**

5.27 The Strategy should **recognise that any plans for new stores or changes to plans for waste importation require engagement between the NDA and elected members and officers from Local Planning Authorities in advance of seeking planning permissions. Wider engagement with the host community must also be undertaken.**

Disposal

5.28 The draft Strategy notes the potential for the Near Surface Disposal (NSD) of some of the UK's ILW inventory. We welcome the acknowledgement that the NSD programme necessitates engagement with local authorities and communities. Nuleaf will continue to act as a forum for engagement around NSD.

5.29 The potential for the LLWR site to accept some ILW is noted; although this is caveated with a recognition of the challenges of emplacing such waste in a facility on an eroding coastline. It is therefore appropriate that any

² [Optimising the number and location of FED treatment facilities and ILW storage facilities on Magnox Limited sites - Final Preferred Option March 2015](#)



consideration of the use of the LLWR for this purpose is part of wider strategic dialogue that also includes consideration of alternative solutions. **Cumberland Council, Nuleaf and any other local authorities likely to be affected must be part of this strategic dialogue.**

5.30 In terms of the GDF programme, we note the continued slippage of the timetable for delivery of a repository – in the 5 years since the last NDA Strategy the planning assumption for the emplacement of the first waste in a GDF has slipped by 10 years – it is now suggested that it will be available from the '2050's' (p.154). It is clearly of concern that the timetable for this critical infrastructure is moving further into the distance, in particular for Cumberland and other areas of the country that host the long term storage of Higher Activity Waste (HAW).

5.31 The withdrawal of Lincolnshire County Council from the process means that only two Community Partnerships (CP) are now active, both within the Cumberland Council area. Given the vital role a GDF plays in enabling delivery of much of the NDA's mission, ensuring an operational GDF is in place as soon as possible must remain a top priority for the NDA and the UK Government. We urge the UK Government to continue committing all necessary focus and resource into ensuring the GDF programme is successful.

5.32 We note the conclusions reached in the IIA about how the impacts of the acquisition of land by the NDA for the construction of necessary new facilities. With the prospect of NDA potentially seeking to acquire land in West Cumbria for a GDF, **full consideration must be given to the need to ensure negative impacts from such a development are minimised and mitigated.**

5.33 We note also the concerns about how the NDA will ensure the availability of the skilled workforce required to service the ongoing mission at Sellafield, including the major new programme of plutonium disposition, while also potentially accommodating the workforce needs associated with construction of a GDF in West Cumbria. **The NDA must work with the local authority and others to ensure that a skilled workforce, capable of delivering all objectives for Sellafield and the GDF is available.**



5.34 The draft Strategy also highlights the potential for *in situ* disposal and disposal with a purpose. Again, **any site level proposals with necessitate early engagement with Local Planning Authorities and the wider community.**

Are there any specific opportunities or considerations you think we should take into account when developing solutions for deriving value from non-radioactive materials, such as through reuse and recycling?

5.35 We welcome the greater prominence given in the draft Strategy to non-radioactive waste. As with radioactive waste, the management of this material impacts on host communities.

5.36 We support the application of sustainable IWM principles to the non-radioactive waste inventory and the commitment to seeking out opportunities to reuse materials.

5.37 Through engagement, **local authorities can assist in the development of new facilities to assist in the sustainable management of waste in locations that are acceptable to the host community.**

5.38 The management of large volumes of LLW/VLLW and non-radioactive material in situ may be an appropriate approach in many contexts, but **any such plans must involve discussion with the host local authority and the community.**

Our strategy sets out the NDA's role in supporting the wider UK Nuclear Enterprise, while maintaining our focus on core mission delivery. Do you think the strategy clearly defines our position? Are there any additional areas we should consider or clarify?

5.39 The UK nuclear landscape is becoming more dynamic, with an increase in activity around new civil nuclear and defence capabilities.



5.40 The NDA's position in relation to this changing landscape is reasonably clear, though as noted earlier it is important to reassure stakeholders that any new responsibilities taken on by NDA Group are done so on the basis that they will not reduce the resources available for existing decommissioning and waste management work.

5.41 We believe that Section 8 should also:

- **Explain what the intended local engagement arrangements will be when AGR stations pass to the NDA/NRS in areas where there is not an existing Site Stakeholder Group (SSG).**
- **Provide more information on how NDA will engage with Great British Energy – Nuclear (GBE-N) and the developer, particularly in relation to the sites at Oldbury and Wylfa.** Our members have indicated that **a more joined up approach to engagement is required, underpinned by a strategic masterplan developed by the Local Planning Authority, NDA/NRS and regulators.** This will ensure a coordinated approach between decommissioning, nuclear new build and other nuclear related proposals (e.g. fuel manufacture) that may come forward.
- **Explain how the NDA Group intends to respond to the new framework for nuclear development set out in the upcoming National Policy Statement on Nuclear Energy Generation (EN-7)** which may result in a range of reactor types being deployed in new communities. This has potential implications for decommissioning and waste management.

Our mission and strategy delivery is underpinned by our Critical Enablers. Do you agree with the proposed Critical Enabler Strategies and that we have focussed on the most important issues in each topic? Are there further suggestions you might have for the NDA to consider, whether general or on a specific Critical Enabler?

5.42 Nuleaf's driving ambition is to deliver the best possible economic, social and environmental outcomes for nuclear communities. Critical Enablers are a vital element of this, ensuring that wider sustainability criteria are integrated into all areas.



5.43 We believe the overall Critical Enablers strategy (p.95-97) is well defined and agree with the decisions made, such as the separation of Environment from Health, Safety and well-being. In terms of specific Critical Enablers:

Environment

5.44 We believe that the NDA **should commit to open and transparent reporting of performance against targets and objectives around the environment and sustainability, potentially as part of a wider public interface on delivery against the SD goals.**

5.45 The NDA should also **commit to developing an inventory of its environmental assets**, many of which were established when nuclear power stations were developed. These have become biodiversity and landscape assets of value not only in terms of environmental mitigation for that original development but also of value to wildlife and local communities. These should form an **important part of the masterplans referred to elsewhere in the strategy and also in informing decommissioning, NNB and other interim or long term development opportunities that may come forward for NDA sites.**

Commercial and Supply Chain

5.46 The draft Strategy notes (p.118) that the NDA Group spends around £2Billion per annum on the supply chain. This large sum of public money should maximise support for local economies and Small and Medium Enterprises (SMEs). It must act as a catalyst for innovation and the creation of new businesses that can generate wider value for the UK economy.

5.47 We support the target for SME spend and welcome further moves to integrate ethical and carbon concerns into procurement.

5.48 There is a perception that, while the headline figure for SME spend is positive, small businesses still find it hard to access opportunities, with much procurement being driven by framework agreements that involve large businesses alongside medium ones. **The information on SME spend should be provided in a more granular form, showing how much spend is flowing to small businesses.**

5.49 In comparison to other large industrial developments, the supply chain spend in Cumberland has not created the same industrial cluster. Successive



Governments have identified decommissioning as a key area where the UK could drive innovation and develop internationally marketable products and services. While this has occurred to some degree, **there is considerable scope to do more. We believe the UK and devolved Governments and NDA Group should step up action in support of this. Local authorities should be engaged as partners.**

Socio-economics

5.50 This section is based to a significant degree on the NDA Social Impact and Communities Strategy and sets out a range of areas of focus for Strategy development (p. 123). We:

- Understand that the Social Impact and Communities Strategy is due for a review in 2027, during the period covered by Strategy 5, but do not see reference to this. If it is planned to undertake a review **this should be included in the CE strategy. Our members would welcome a commitment to a full review of the Strategy, as opposed to the limited refresh undertaken in 2024. The NDA Group, and the wider context, has changed significantly. A new Strategy, built on proper engagement with Nuleaf, local authorities and other stakeholders is therefore needed.**
- Would **welcome an explanation as to how the significant expansion brought about by the incorporation of the AGR sites will impact on the overall socio-economic support provided.** Communities need assurance that existing socio-economic spend will not be spread more thinly as areas that do not include a current NDA site are brought into the estate.
- Note that the independent economic impact studies are due for refresh this year. We understood that these studies would cover a wider range of social as well as economic factors than previous iterations – the social aspects of support are important to our members and host communities. **The scope of the refreshed studies should be clarified in the Strategy 5 text.**
- Note the recent agreement of a joint venture between Cumberland Council and the NDA at Pioneer Park, intended to support development of clean energy. This is welcome, as is the commitment to develop a masterplan for the site, but the true test will be in the delivery. **This will require the active support of Sellafield and the NDA, ensuring that the decommissioning needs of Sellafield can be delivered alongside new infrastructure development.**



- Believe that the **NDA Group should enhance its dialogue with local authorities where there is potential for partnership working around STEM, education, skills and new economic activity on NDA land.**
- Believe that **more needs to be done to develop a 'One NDA' way of working when it comes to engagement around socio-economics. We would welcome dialogue with NDA Group on this.**
- In terms of the GDF programme, **more flexibility is required in terms of the defined boundaries for Community Benefits payments, and the projects that can be funded.** We recognise that this issue is one that may need addressed at Government level.
- Would encourage the NDA **to undertake further direct engagement with individual host authorities, to ensure that their corporate priorities, plans and strategies are understood and informed by the NDAs plans at a strategic and local level where appropriate.**

5.51 We also note the recent UK Government consultation on a Working Paper on Community Benefits and Shared Ownership for Low Carbon energy Infrastructure.

5.52 Nuleaf submitted a response to this³ in which we argued that (a) for new nuclear projects, community benefits should be payable across the lifecycle of the station, not just the generation phase and (b) that a similar framework for community benefits should be developed for decommissioning and waste management. We have long argued that **the NDA should adopt a framework for community benefits that would cover all areas of operation, ensuring fairness for all impacted communities.** The UK Government's thinking in relation to new nuclear, renewables and grid infrastructure is aligned with our view and **we would welcome a dialogue with NDA on this.**

³ [Consultation Responses - Nuleaf](#)



Public and Stakeholder Engagement (PSE)

5.53 Nuleaf works to facilitate dialogue between our members and the NDA, ensuring the voice of communities is heard.

5.54 We agree with the general strategy for PSE and the plans for Strategy development. Local authorities can assist in engagement with seldom heard voices, something councils have a long experience of.

5.55 Nuleaf will publish independent research on stakeholder engagement in nuclear in the near future. This research has identified a range of areas where the approach at a national and local level could be enhanced, and **we would welcome a commitment in the Strategy that the NDA will engage with Nuleaf, local authorities, SSGs and others to consider fully the recommendations of the Nuleaf research, the recent SSG review (p.129) and the research from the University of Aberdeen that is referenced (p 128.)**

5.56 We note the lack of reference to the NDA Stakeholder Summit within the text. **It would be timely for the NDA to engage with Nuleaf and others on how resources for national engagement can be best utilised in future. This would support the aspiration that is set out (p.130) to better co-ordinate engagement across the NDA Group and lead to engagement that is more reflective of and gives a more representative voice to NDA's host communities, supporting the social license to operate.**