

December 2025

Ensuring Effective NDA Community and Stakeholder Engagement



Executive Summary

Nuleaf has played a vital role in representing the interests of local government and communities on nuclear matters. Nuleaf, and those it represents, are critically important stakeholders for the Nuclear Decommissioning Authority (NDA) and the UK and Devolved Governments.

This year marks twenty years since the founding of both Nuleaf and the NDA. Over that time, Nuleaf's role and influence has expanded, and the NDA's mission has developed. The means of engaging stakeholders and communities have also evolved. It is therefore timely to review the NDA's stakeholder engagement activities and how Nuleaf represents the interests of its local authority membership.

This report, undertaken by independent consultants Doug Bamsey and Steve Smith, has been prepared through engagement with NDA Group, UK and international comparator bodies, the membership of Nuleaf and others. The study has identified:

- New options for the NDA to consider that could further strengthen engagement with local authorities and communities.
- Opportunities for Nuleaf to further enhance its effectiveness as an organisation representing local authorities and communities dealing with our nuclear legacy.

The recommendations are set out in full in Section 10 of the report but can be summarised as follows:

Recommendations for the NDA Group

That the NDA:

Builds on the progress on engagement that has been made in recent years and further embeds this through dialogue with Nuleaf and others to establish a protocol which articulates the relationship between the NDA,

Nuleaf, local communities and Site Stakeholder Groups (SSGs). It should also consider ways in which Nuleaf, working with SSGs and the NDA, could help support enhanced and better integrated local engagement, informed by recent NDA sponsored research on SSGs and deliberative democracy.

Recognises the value of Nuleaf to the delivery of the NDA mission and in demonstrating compliance with the requirements of the Energy Act (2004). While resource pressures on the NDA Group are significant, a review of the support and advocacy Nuleaf can offer the NDA group would be of benefit. There may be opportunities to consider new ways in which Nuleaf can support the NDA's engagement objectives.

Recognises that Nuleaf is **the** representative body of the Local Government Association (LGA), with a broad membership incorporating all views on the nuclear agenda. It is the only local authority network that includes the councils that host NDA sites and is able to constructively engage in decommissioning and remediation. The Nuclear Free Local Authorities (NFLA) is a much smaller organisation that does not represent any host local authority and campaigns against aspects of the NDA mission such as a Geological Disposal Facility (GDF).

Working with Nuleaf, look to identify mechanisms to support poorly resourced local authorities to engage with the NDA and provide encouragement to Councils to allow them to develop strategy, policy and plans which support the delivery of the mission.

Work with Nuleaf to consider the potential for the development of Community Hosting Agreements (CHA) between host local authorities and the NDA Group that would serve to support engagement and the maximisation of local 'added value'. A CHA has already been considered in relation to the Lincolnshire GDF process, and these mechanisms are widely employed in other countries.

Recommendations for Nuleaf

That Nuleaf:

Undertakes a review of its membership model to encourage more local authorities to become full 'Contributing' members. It is recognised that raising additional revenue from local authorities in the current financial climate is likely to prove challenging, but there may be opportunities to create a more sustainable membership base and also to explore the scope for new funding streams.

Engage with member Councillors and officers to identify the scope for them to further disseminate information on Nuleaf's work to others within their local authority, ensuring the greatest possible reach and impact of engagement within each council.

Further build the benefits of membership, in particular through a programme of mentoring of officers and councillors. Adopt a more formal/structured mentoring capability to assist new LA members in their development of core knowledge of nuclear legacy and the organisations involved. A focus of this should be Councillors and officers from new or recently restructured local authorities, and those from authorities that do not currently participate in the network on a regular basis.

Make even greater use of workshops, potentially hosted at the local or regional level rather than via on-line meetings.

Further develop a leadership role, building on existing activity. The aim would be to facilitate debate and policy development and to reach out to and proactively bring together a wide range of organisations that are decision makers/influencers/stakeholders in nuclear legacy.

Further enhance LA active participation (Contributing and Corresponding Members): to share best practice, to mentor and support each other, to work collaboratively.

Explore the potential to provide secretariat support for the New Nuclear Local Authority Group (NNLAG), through further engagement and dialogue between Nuleaf and NNLAG members. Any provision of Secretariat support to NNLAG would be conditional on the accessing of new (non-NDA) funding streams.

Develops a more proactive programme of external communication, ensuring Nuleaf is seen as a significant voice in relevant debates via the national and local media and social media platforms.

1: Introduction

Both the NDA and Nuleaf have been in existence for 20 years. It is therefore timely to review the NDA's stakeholder engagement activities and how Nuleaf represent the interests of its' local authority membership.

Nuleaf has therefore commissioned independent consultants Doug Bamsey and Steve Smith to consider potential options to enhance stakeholder engagement delivered by the Nuclear Decommissioning Authority (NDA). The NDA provided part of the funding for this work and there was liaison between the consultants, Nuleaf and the NDA's communications and engagement Director across the study. However, the conclusions and recommendations set out here are those of the independent consultants commissioned to undertake this work.

The purposes of the study are to.

- Consider the NDA stakeholder landscape and assess current arrangements for stakeholder engagement.
- Gather views from Nuleaf members on existing and future NDA local authority and community engagement activities.
- Review best practice nationally and internationally – in terms of comparable industries and nuclear/radioactive waste management engagement in other countries.
- Suggest potential enhancements to NDA's approach to stakeholder engagement. The recommendations in this report should be considered in tandem with inputs from other stakeholder groups such as the SSGs.

- Set out a clear role for Nuleaf within the evolving stakeholder landscape, one that supports local engagement by Nuleaf member authorities and complements NDA stakeholder engagement.
- Raise the profile of Nuleaf with existing and potential local authority members.

The study has been conducted through a series of consultations – with Nuleaf members, national bodies comparable to the NDA and international local authority and radioactive waste management organisations.

The report includes a baseline analysis of the current approach to stakeholder engagement by the NDA and of how Nuleaf represents the interests of its' membership, including the role and purpose of both bodies.

This study was carried out at the same time as two complementary studies commissioned by the NDA. One looked at the effectiveness of Site Stakeholder Groups (SSGs) and the other considered how new citizen participation techniques might be used to benefit stakeholder engagement.

This report concludes with a range of recommendations for consideration by both the NDA and Nuleaf. The recommendations are based on feedback, evidence and opinions from consultees gathered during the study period. The study also included the undertaking of a Strengths, Weaknesses, Opportunities and Threats (SWOT) analysis and a Risks, Issues, Assumptions and Dependencies (RAID) register. These have been provided to Nuleaf separately.

2: The role of the NDA

The Nuclear Decommissioning Authority (NDA) was established in 2005 as a Non-Departmental Public Body under the Energy Act (2004). It has a corporate centre and four main component parts:

- Sellafield
- Nuclear Restoration Services (NRS)
- Nuclear Waste Services (NWS)
- Nuclear Transport Solutions (NTS).

The NDA mission is to clean up the UK's earliest nuclear sites safely, securely and cost effectively, with care for the environment, local communities and people at the heart of the work, leaving individual sites ready for their next use. The mission, with an estimated timescale of over 100 years, encompasses 17 sites across England, Wales and Scotland.

The NDA estate includes more than 800 buildings to be demolished on over 1,000 hectares of designated nuclear licensed sites, with the NDA directly employing around 17,000 people, in addition to supply chain contractors. The Group mission has expanded in recent years to include the decommissioning of the Advanced Gas Cooled Reactors (AGRs) and the Vulcan facility beside Dounreay.

As well as the technical matters relating to decommissioning and clean-up, the NDA has a range of supplementary functions including supply chain development, research and development, skills, socio-economic support for local communities, and stakeholder engagement. The Authority is also responsible for the geological disposal of higher activity radioactive waste and the management of low-level radioactive waste and other wastes generated through decommissioning.

The Energy Act requires the NDA to review and publish their Strategy every 5 years. The last NDA Strategy (Strategy 4) was published in 2021 with the next iteration (Strategy 5) due for publication in 2026 following a public consultation. Strategy 5 estimated that the mission will cost around £98.5 Billion, the majority of which will be provided by the UK Government and funded by the country's taxpayers. In the year 2024/25 the NDA's expenditure was £4.098Billion¹. The current draft Strategy is based around five themes:

- Site Decommissioning and Remediation
- Spent Fuel Management
- Nuclear Materials
- Integrated Waste Management
- Critical Enablers – undertaken to support the delivery of the mission.

¹ <https://www.gov.uk/government/publications/nuclear-decommissioning-authority-business-plan-2024-to-2027/nuclear-decommissioning-authority-business-plan-2024-to-2027#our-funding>

3: The role of Nuleaf

The Nuclear Legacy Advisory Forum (Nuleaf) was founded in 2005, a response to the creation of the Nuclear Decommissioning Authority (NDA). Local authorities, led by Cumbria County Council and Manchester City Council, established Nuleaf as a Special Interest Group (SIG) of the Local Government Association (LGA) – see below.

The **Constitution** sets out the **remit** of Nuleaf as follows:

'Nuleaf 's remit encompasses all aspects of the management of the UK's nuclear legacy. This includes the implications for legacy nuclear sites and waste management of any developments that are likely to impact on the management, including proposals for new energy generation, transmission and storage infrastructure.'

The **Primary Objectives** of Nuleaf are:

- To provide a mechanism to identify, where possible, a common local government viewpoint on nuclear waste management issues.
- To represent that viewpoint, or the range of views of its members authorities, in discussions with national bodies, including Government, the NDA, NWS, NRS 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.

Over recent years Nuleaf has expanded its influence and scope. Engagement with Government and the NDA Group has developed, with Nuleaf now sitting on a wide range of NDA fora and Government advisory groups. There has been particular growth in engagement around land use and waste planning, focused on establishing mechanisms that support the sustainable remediation of sites.

International dialogue has undergone a step change since a decision was taken to affiliate to GMF Europe, the network of European nuclear municipalities, in 2017.

Through GMF, Nuleaf has been working to establish a Nuclear Communities Global Partnership, launched in 2025, with Nuleaf's Executive Director sitting on the Board. Engagement has also developed with the International Atomic Energy Agency (IAEA), based on their growing recognition of the importance of the political and social aspects of nuclear. International engagement has significant value in terms of dialogue and learning from others, and in ensuring a UK voice is heard in institutions such as the IAEA. Nuleaf's engagement in international fora is funded by the IAEA and GMF Europe.

A landmark was achieved in early 2025 with the appointment of a Co-ordinator to support the Scottish local authority network on nuclear, SCCORS. Funded by NDA and hosted by Nuleaf, this new post will greatly enhance engagement by Scottish local authorities. It offers scope for Britain wide dialogue on common issues for England, Scotland and Wales such as Advanced Gas Cooled Reactor (AGR) decommissioning.

4: Baseline

NDA current approach to Stakeholder Engagement

At time of writing, the NDA is consulting on its next five-year Strategy (Strategy 5) covering 2026-31. The draft includes a range of strategies aimed at supporting the delivery of the NDA mission. These are referred to as Critical Enablers, one of which is Public and Stakeholder Engagement. Other Critical Enablers relevant to this study include: Health, safety and wellbeing; Environment; People; Asset management and continuous improvement; and Socio-economics.

In a change from the previous Strategy, Sustainability, previously a Critical Enabler, is embedded as a cross-cutting principle in the draft.

The objective of the Public and Stakeholder Engagement Critical Enabler is *'To build a better understanding of our mission among the public and our stakeholders, and maintain their support, confidence and trust.'* The draft Strategy states *'We strongly value our existing stakeholder connections and are committed to further deepening relationships through more meaningful discussions. We are also keen to engage with new and harder-to-reach audiences, with recognition that our work will continue into the next century.'*

The draft NDA Strategy commits the NDA to:

'Enhance our existing local authority networks and continue to engage with the Nuclear Legacy Advisory Forum (Nuleaf), Nuclear Free Local Authorities (NFLA) and the Scottish Councils Committee on Radioactive Substances (SCCORS).'

Other critical engagement is identified by being via the Site Stakeholder Groups (SSGs), Non-Governmental Organisations (NGOs) and bodies such as trade unions. The Strategy emphasises the need to continue to review opportunities to engage with seldom heard

groups and others not currently aware of the scale and scope of the NDA's mission; and to consider the wider use of social media.

How Nuleaf Operates Currently

Nuleaf is a Local Government Association (LGA) Special Interest Group (SIG). The LGA outlines the basis for SIGs as follows:

'If ten or more Member Authorities with common features, interests or concerns so request by formal notice to the Chief Executive, then the Association, acting through the LGA Board, may establish a Special Interest Group (SIG). Membership shall be open to all Member Authorities with those common features. Political proportionality does not apply.'

'SIGs are able to speak for their interests as part of the LGA provided that their policies or statements do not conflict with or undermine LGA policy as a whole or damage the interests of other member authorities.'

The latest annual return to the LGA, for 2024, records 105 Local Authority (LA) members of Nuleaf, including National Parks, of which 12 are Contributing Members, which pay a membership fee. There are also 85 corresponding members, along with 3 National Park Authorities and 5 Nuclear Free Local Authorities (NFLA) councils.

Current fees range from £665 per annum for LAs with a population up to 100,000 to £2,660 for LAs with a population over 1 million.

Contributing Members are eligible to vote on issues at Nuleaf Steering Group meetings, to guide Nuleaf business and represent Nuleaf on outside bodies.

Corresponding Members are consulted on radioactive waste management issues and invited to participate in the Nuleaf AGM, Steering Group and Radioactive Waste

Planning Group (RWPG) meetings, but they do not have a vote. A small number of Corresponding Members do attend meetings, some on a regular basis.

Contributing Members have access to the members section of the web site – see below – which has the potential to allow the sharing of policy and strategy information. All members receive a quarterly Ebulletin, while Contributing Members also receive a monthly newsletter (see below). In terms of funding in the financial year 2024-25 Nuleaf income was as follows:

| Source | Amount |
|------------------------------------|---------|
| NDA | £60,000 |
| NDA – contribution to project work | £15,000 |
| NRS (formerly Magnox) | £40,000 |
| NWS | £40,000 |
| IAEA | £5,849 |
| Member Authorities | £19,430 |

Member authorities contribute around 10% of total income and local authority Contributing Member fees have been frozen since 2009 in recognition of the funding challenges faced by councils. The International Atomic Energy Authority (IAEA) funding was specifically for attendance at an IAEA meeting.

The NDA Group core funding has remained at £140k since 2021/22, though it should be noted that, the NDA have recently provided an additional £30,000 to fund SCCORS (Scottish Council Committee on Radioactive Substances). An officer, located within the Nuleaf team, took up the role of SCORRS Co-ordinator in February 2025 on an initial 12-month contract.

There are currently no formal agreements in place for the NDA, NRS or NWS funding.

5: Stakeholder engagement – a national comparison

This part of the study provides a national comparison of stakeholder engagement, through reviewing the approach undertaken by a sample of organisations comparable to the NDA. The research was undertaken through both interview and desk research. The bodies consulted were:

- Office for Nuclear Regulation (ONR)
- Nuclear Industry Association (NIA)
- National Grid Electricity Transmission
- EDF Nuclear Operations
- Oil and Gas Authority/North Sea Transition Authority

The research provided some useful observations and conclusions.

All the organisations contacted understood the significance of developing a relationship with their stakeholders, although the approaches were varied.

Some organisations limited their approach to being reactive – only responding to stakeholders when probed to do so. Others took a vastly more pro-active approach where stakeholder engagement was a central part of organisational policy and where significant resource has been invested to generate and deliver the approach to stakeholder engagement. Some use stakeholder engagement specifically for consultation and for testing new policy approaches, while others are resource

intensive involving complex governance structures often including local community groups and local authority representatives.

Like the NDA, some organisations that were consulted are obligated by legislation or Government directives to consult with their stakeholders on a regular basis, while some are driven by commercial opportunity and by the expectations of their stakeholders. Others use engagement to aid understanding of their role and to gain the confidence and trust of those they engage with.

In some instances, organisations recognise the role that stakeholders can play, through collaboration, in supporting the delivery of projects and their wider mission.

The research identified that the most comprehensive of approaches are 'data led', where evidence gathered from stakeholders directs the engagement activity of the organisation, with evaluation and assessment techniques employed to monitor achievements and shape subsequent activities.

Finally, the research identified a range of techniques employed to generate stakeholder engagement but didn't identify any specific activities that performed better than others.

6: Stakeholder engagement, an international comparison

The research included interviews with representatives of international organisations. These organisations were local authorities and nuclear waste management organisations engaged in communities that are currently hosting or potentially hosting radioactive waste management facilities and/or existing or former nuclear power stations. The Mayor of Clarington, who was interviewed, is also the Chair of the Canadian Association of Nuclear Host Communities (CANHC). The lead officer of KSO in Sweden was also interviewed. Both KSO and CANHC have similar roles to Nuleaf. Overall, the following organisations were consulted for this research:

- Finland – Eurajoki Municipality and Posiva
- Holland – Borsele Municipality and Covra
- Sweden – Osthimmer Municipality, SKB and KSO
- Canada – Clarington Municipality, NWMO and CANHC

A structured questionnaire was devised and used as a template for individual conversations with representatives from these organisations.

Whilst organisational culture was different across the four countries, one common message was that all the participant municipalities felt that they had a very positive relationship with their respective radioactive waste management organisation/company (RWMCo). Some commented that they had direct access to the CEO of the radioactive waste management organisation.

All commented that openness and trust were fundamental to the relationship – with a commitment ‘to do what we said we would do’. In some instances, commitments from the RWMCo were included within legal documentation to ensure that they are delivered.

Despite the change in meeting behaviours brought about by the Covid 19 pandemic, all felt that long term relationships between a community and the RWMCo were better established by in-person contact and that open meetings with residents and community

groups were important in the early stages of an engagement process. Social media was viewed as being supplementary to in-person contact in later stages when good relationships had been established.

One factor viewed as being important was a commitment from the RWMCo’s to invest in the locality i.e. to be seen ‘on the patch’, establishing local offices, procuring services from local businesses, employing local people and establishing information centres describing the tasks of decommissioning and radioactive waste management.

Several of the international organisations commented on their desire to establish more formal agreements with their respective RWMCos to underline their commitment to supporting the local community. The suggested scope of such ‘Community Hosting Agreements’ (CHAs) could include local procurement of support services, funding for agreed infrastructure proposals and support to local community activities.

There was also a strong message that the process is as important as facts and information. People want to know the steps in the process and the timescales involved, particularly given the long timeframes for many nuclear and radioactive waste related projects. Organisations need to be aware of seldom heard groups within localities and employ techniques to engage with them.

Many of the local communities strongly supported the existence of the nuclear and radioactive waste management facilities within their local area, acknowledging the positive economic impact that they have.

Some of the RWMCo’s conduct annual surveys of local residents to test their satisfaction with the operation of stakeholder engagement activities, whilst others promote activities which allow local residents to seek further information about the challenges of nuclear decommissioning and radioactive waste management.

Many of the municipalities seek financial support from their RWMCo's through an 'added value programme' to support the delivery of their local economic strategies including investment in infrastructure, training and education facilities. Other important lessons learned from stakeholder engagement activities internationally include the requirement to provide high quality and up to date visuals and to maintain a database of activities undertaken, their impact and comments received by stakeholders.

Beyond these general dimensions of good practice, some specific examples of innovations were identified. As an example, in Borsele the RWMCo, COVRA has established a radioactive waste store that employs

an innovative design and houses many of the country's art treasures alongside radioactive waste, given the suitability of the environment required for waste storage. The store is open to the public, and visitors gain an understanding of waste management challenges at the same time as viewing the country's treasures.

Several of the national and international comparators emphasised the need to be meticulous in planning, monitoring and evaluating their stakeholder engagements. It was seen as important to maintain records of all stakeholder responses to specific events and use the responses to shape future stakeholder engagements and develop plans for site works.

7: The effectiveness of Nuleaf representing Local Authorities – Key Messages

The study included interviews with a number of Nuleaf member Authorities – both Contributing and Corresponding, both active and less active members. Councillors and officers were interviewed. The latter included the Nuclear Free Local Authorities (NFLA) Secretary.

- Cumberland Council – Councillor
- Essex County Council – Officer
- Hartlepool Borough Council – Officer
- Lancaster City Council – Officer
- Manchester City Council/Nuclear Free Local Authorities – Officer
- Eryri/Snowdonia National Park Authority – Officer
- Somerset Council – Councillor and Officer
- South Gloucestershire Council – Officer

Five other Nuleaf member Local Authorities were contacted but did not respond.

A range of UK nuclear sector organisations were also interviewed:

- NDA
- Nuclear Waste Services (NWS)
- ONR
- EDF Nuclear Operations

A structured questionnaire was devised and used as a template for individual conversations with representatives from the organisations. Throughout the study there was regular dialogue with the Executive Director of Nuleaf and liaison with a comms and engagement Director at the NDA.

These conversations, backed by general background research, confirmed a high degree of consistency in the views of Local Authorities and Nuclear Legacy industry on the role and purpose of Nuleaf and the potential for positive evolution in reach, role and influence on behalf of Local Authorities – building on Nuleaf's achievements.

The key messages can be broken down into 8 themes and areas for evolution, as a basis for an integrated package of recommendations that cover:

1. Celebrating/acknowledging what Nuleaf already achieves
2. Increasing the reach across Local Authorities hosting nuclear legacy
3. A more proactive, leadership role
4. More active Local Authority participation
5. Working with New Nuclear Local Authorities (NNLAG)
6. The relationship with Nuclear Free Local Authorities (NFLA)
7. Achieving greater recognition/a higher profile
8. Resourcing evolution

Key message – Celebrating/acknowledging what Nuleaf already brings

There is a great deal to celebrate and acknowledge in what Nuleaf already provides and achieves both for its' LA members and the nuclear legacy industry consistent with the organisation's remit and primary objectives.

It is an organisation that is well respected by both the LA membership and the nuclear decommissioning /radioactive waste industry, one that is seen as effective and positive, performing a role of facilitating communication with and influence on Government and the NDA's decisions and activities on behalf of Local Authorities.

Nuleaf brings together the 'LA nuclear legacy family' across England and Wales, giving strength in numbers. It provides important national context to local decisions and guidance for officers working on nuclear issues, some of whom work on nuclear only part time. Nuleaf supports them and reduces their sense of isolation.

It provides a regular programme of meetings both face to face and online, with papers prepared in advance and minutes recorded. Members also receive regular newsletters, policy briefings, can hear from invited speakers and engage in site visits. Nuleaf represents Local Authorities on a wide range of national nuclear forums and working parties. The Executive Director is well respected, as inclusive, positive and a good facilitator.

It is an organisation that is evolving as the nuclear legacy context changes, with an ongoing process to deliver a Geological Disposal Facility (GDF) and significant changes to decommissioning and waste management practice. UK Government policy to encourage new nuclear also has implications and opportunities for nuclear legacy.

Over recent years Nuleaf has developed stronger positive relationships across the NDA organisation and with other nuclear legacy related organisations such as the Committee on Radioactive Waste Management (CoRWM), the Office for Nuclear Regulation (ONR), Environment Agency (EA), and the UK Government – the Department for Energy Security and Net Zero (DESNZ).

The relationship with Government is a critical one. The Executive Director holds regular meetings with a lead civil servant for decommissioning and waste management in the UK Government and has also been invited to join the main UK Government forum for nuclear, the Radioactive Substances Policy Group (RSPG). A Welsh members forum meeting was held in 2023, involving Welsh Government and local authorities and it is hoped to hold another meeting focussed on Welsh nuclear issues within the next year.

Nuleaf has recently recruited a Co-ordinator to support Nuleaf's sister organisation, SCCORS (Scottish Council Committee on Radioactive Substances). This appointment was encouraged and supported by the NDA, a recognition of the benefits that an organisation such as Nuleaf can bring both to local authorities and to the NDA as they progress their mission. Helping ensure an effective LA representative body dealing with nuclear legacy in Scotland is clearly important in itself. Moreover, it gives Nuleaf an involvement/perspective across Great Britain.

Nuleaf also has strong and productive international links. These have grown significantly in recent years, with close working with the Group of European Municipalities with Nuclear Facilities (GMF). Through GMF, Nuleaf has been working with colleagues in the USA, Canada and elsewhere to establish a Nuclear Communities Global Partnership (NCGP).

Nuleaf is also actively engaged in the growing work on local engagement that is undertaken by the International Atomic Energy Agency (IAEA). Nuleaf's Executive Director sits on the Board of GMF Europe as Vice President and is engaged in the recently established Board of the Nuclear Communities Global Partnership. International engagement has proved valuable in building dialogue and sharing best practice and has helped enable this research. Funding is often provided to cover the costs of international meetings.

Nuleaf undertakes annual work programming, set out in a Service Plan considered and agreed by the Steering Group and reviewed with the NDA. Nuleaf publishes an Annual Report that is sent to all members and stakeholders; and a report setting out performance in delivering against agreed outputs and outcomes contained in the Annual Service Plan. This is shared with the NDA, members and other stakeholders.

Key Message – Increasing the reach across Local Authorities hosting nuclear legacy.

Over the last 5 years membership levels have remained stable, both in terms of total membership and the number of Contributing Members. In 2018 there were 100 members in total of which 14 were Contributing. Membership now stands at 105 local authorities of which 12 are contributing. The small decline in Contributing Members is almost entirely related to local government reorganisation, which has reduced the number of LA members in former two-tier areas such as Somerset and Cumbria. In fact, a new Contributing Member, Lincolnshire, has joined, although Manchester City Council, an NFLA Council, does not now contribute.

That Nuleaf as a SIG has over 100 LA members is a very notable strength, confirming its' status as representing a significant and broad body of Local Authorities in England and Wales that see themselves as stakeholders in nuclear legacy.

The membership make-up has changed over time, although not radically. This is unsurprising given the geography of nuclear legacy sites is relatively fixed. Most local authorities have maintained membership over the long term, nonetheless several formerly Contributing Members are now Corresponding Members, while others that were once Corresponding now financially contribute.

A notable shift has been the presence previously of several London Boroughs. This is potentially linked to the decline in NFLA members Councils (see above and below).

In terms of the location of nuclear legacy sites across England and Wales, the number and geography of LA membership of Nuleaf (including both Contributing and Corresponding membership) is highly representative, covering all NDA sites and related infrastructure. That said, several LAs that represent significant nuclear legacy locations restrict their membership to the Corresponding level and these (with a few exceptions) do not participate in meetings. One Contributing Member LA is not a regular attendee at meetings though they do participate in the Annual Gathering.

Key Message – A more proactive, leadership role

The nuclear legacy industry (NDA, NRS and NWS) would welcome an even more proactive Nuleaf role, to help facilitate the debates required, to help identify issues and then work collaboratively to address them. This could build on the progress that has already been made in ensuring NDA Group input into the annual Nuleaf Service Plan, in reporting and discussing Nuleaf's work through regular meetings with senior NDA staff, and through Nuleaf's reporting of its work to stakeholders.

Mention was made of reaching out more to other stakeholders/decision makers in the nuclear sector, such as the Committee on Radioactive Management

(CoRWM). Significantly, and suggesting the need for enhanced communication, this appears more of a perception rather than a reality, with Nuleaf regularly attending CoRWM meetings and engaging with CoRWM members.

Reference was also made of seeking ambition, to identify the potential of nuclear legacy sites, for Local Authorities 'to dare to dream', i.e. to be ready to think more strategically and longer term.

Several Local Authorities officers would welcome a more proactive role in promoting shared best practice. While Nuleaf does comment on emerging Local Plan policies for legacy sites, a greater level of advice/involvement is sought. Also highlighted was the value of a library/shared resource of planning policies emerging and adopted – however, such a resource was created a couple of years ago but has not been regularly accessed despite efforts to encourage use. There is also a desire for training of LA officers. Mention was made of Nuleaf proactively identifying training opportunities by way of meetings and events provided by other organisations.

As with the nuclear legacy industry, there was mention of developing vision and ambition. Without doubt there is a willingness on the part of the Executive Director for Nuleaf to take a more proactive/leadership role in further policy development and raising ambition. For example:

- There has in recent times been discussion between the Director of Nuleaf and NWS on how Nuleaf could work more closely with NWS in supporting local GDF Community Partnerships.
- A recent meeting with Avison Young, planning advisors for NDA, on permitted development rights is a good example of the potential for deeper engagement/collaboration. Wider engagement with NDA group and Government is ongoing on a range of planning related issues including landfill disposal, EIADR, Planning Performance Agreements (PPAs) and Masterplans, all of which is helping facilitate the delivery of the NDA mission.

In terms of reaching out to organisations involved in nuclear legacy, Nuleaf meets quarterly with ONR and involves the ONR and Environment Agency in its' meetings as appropriate. The Executive Director also meets on a regular basis with EDF and NRS staff involved in the decommissioning of the AGR fleet, and with CoRWM. That said, scope remains to enhance this further.

The more that Nuleaf facilitates and is proactive, the more compelling is the case for a Local Authority to fully participate and contribute financially; and the more it is seen as a body of significance by the nuclear legacy sector, other stakeholders and Government. This is not to say that Nuleaf is not currently proactive, but that there remains positive scope to do more to enhance the environment in which NDA group is progressing its mission.

Key Message – More active Local Authority participation

In total, as outlined above, Nuleaf has around 100 LA members, of which 12 are Contributing Members.

In terms of attendance at Steering Group meetings, between September 2023 and September 2024 a minimum of 11 and a maximum of 15 LAs were represented, and between April 2023 and September 2024 the attendance at Radioactive Waste Planning Group meetings ranged between 6 and 14 LAs. Attendance at both meetings is at significantly higher levels than it was in 2016, up by approximately 30% over that timeframe (2016 being the earliest date attendance records go back to).

As is to be expected, it is the Contributing Members that make up the great majority of attendees at both meetings. Nonetheless, several Corresponding Members attend both meetings, some regularly. One Contributing Member LA does not attend meetings on a regular basis.

At Steering Group, a councillor and officer meeting, several LAs that are Contributing Members are represented only by officers, in some cases at all meetings.

Key Message – Working with New Nuclear Local Authorities

The UK Government has in recent years pursued a policy of promoting new nuclear. The current UK Government, elected in July 2024, has emphasised its desire to support a large new nuclear sector. The Government has given the final go ahead for a new Sizewell C plant and is supportive of the development of Small Modular Reactors (SMRs) and Advanced Modular Reactors (AMRs).

A majority of Nuleaf members are keen to ensure that there is close working on new nuclear, particularly given the relationship there is with new nuclear in terms of the NDA estate and longer terms issues of waste disposal and storage.

On the other hand, there is a view (expressed by a NFLA member authority) that Nuleaf involvement with new nuclear represents 'mission drift' and that if LAs want to 'support new nuclear' they should do so in a new nuclear authority group. Members who wish to have a greater focus on new nuclear argue that the aim of engagement with new nuclear is not to 'support it' but to ensure that the views of councils and communities that are likely to host new nuclear facilities are better represented.

Some Nuleaf members feel that the NFLA member Local Authorities have been a blocker to Nuleaf in addressing the relationship between new nuclear and nuclear legacy, and Government expectations that the NDA should work with Great British Nuclear (GBN) on sites where new nuclear may be developed around an existing nuclear legacy site.

As a reminder, the Constitution sets out the remit of Nuleaf as follows:

'Nuleaf 's remit encompasses all aspects of the management of the UK's nuclear legacy. This includes the implications for legacy nuclear sites and waste management of any developments that are likely to impact on the management, including proposals for new energy generation, transmission and storage infrastructure.'

Several Local Authorities with new nuclear progressing or a potential in their areas have formed a LGA Special Interest Group (SIG) – the New Nuclear Local Authorities Group (NNLAG). The aim of NNLAG as set out in the 2024 annual return to the LGA is as follows:

'To provide a supportive national network for local authorities that are or likely to be affected by new nuclear development to make representation direct to Government and elsewhere on all matters related to nuclear new build and advanced nuclear technologies, including the production of nuclear-related hydrogen and other low carbon synthetic fuels, and nuclear-related transmission projects.'

NNLAG's annual report to the LGA in 2024 identified 8 Local Authorities as members:

- Suffolk County Council
- Anglesey County Council
- East Suffolk Council
- Essex County Council
- Folkestone and Hythe District Council
- Maldon District Council
- Somerset Council
- South Gloucestershire Council

All of the NNLAG member Councils are members of Nuleaf and of those only Maldon is not a Contributing Member.

In recent times there have been several joint meetings of Nuleaf and NNLAG, including for example a jointly organised online meeting with Great British Nuclear (GBN) in July 2024 and other meetings on Small Modular Reactors (SMRs) and Advanced Modular Reactors (AMRs). In organising these meetings Nuleaf has sought to include speakers offering an NFLA perspective, though this offer has not always been taken up. The monthly Nuleaf newsletter, Forum, includes new nuclear developments and Nuleaf meetings are updated by LAs on new nuclear development in their area.

There has previously been talk of a shared secretariat between Nuleaf and NNLAG, or potentially even amalgamation.

As noted earlier, it would be wrong to assume that local authorities that are members of NNLAG are necessarily in favour of new nuclear, i.e. seeking to promote it. They do share a common interest to help shape new nuclear to achieve the best outcomes in a locality, believing that in coming together they can share knowledge and experience and have a greater influence on Government and the nuclear industry.

At a high level, working together to achieve the best outcomes for their locality, the two LGA SIGs share the same objectives. The difference being of course that Nuleaf is focused on nuclear legacy and NNLAG on new nuclear and advanced nuclear technologies.

Internationally there is generally one national Local Authority organisation working across the whole nuclear cycle and covering both legacy and new nuclear.

Key Message – The Relationship with Nuclear Free Local Authorities (NFLA)

NFLA has a longstanding relationship with Nuleaf – NFLA councils were members of Nuleaf from the outset. Until recently Nuleaf provided for a NFLA council to hold a Vice Chair role (one of two), from a Contributing Member of the NFLA. However, the decision of Manchester City Council, the only NFLA authority that was a Contributing member, to end its paying membership, meant that under the Constitution the NFLA lost its Vice Chair role and voting rights.

The Nuleaf 2024 LGA SIG return lists 4 NFLA LAs as Corresponding Members. Of these Manchester City and Hull City have attended Steering Group meetings in the last year.

The wider Nuleaf LA membership is generally supportive of having a broad range of views on nuclear 'in the room', and respects the position taken by NFLA member authorities.

The NFLA web site sets out the following:

'For over four decades, the UK/Ireland Nuclear Free Local Authorities (NFLAs) have been the voice for local authorities opposed to civil nuclear power and in favour of renewables.

The NFLA's aims are to identify the impact of national nuclear policy on local communities; increase local accountability over national nuclear policy; work to minimise nuclear hazards and increase public safety; and champion the generation of energy using renewables.'

NFLA is therefore explicitly an organisation that campaigns against civil nuclear power, with this encompassing opposition to aspects of nuclear legacy management such as geological disposal. Notably, Nuleaf has neither a pro nor anti-nuclear power stance, rather it is a forum that seeks to represent the local government viewpoint on nuclear legacy management issues.

NFLA has 6 Local Authority members in England and Wales, together with 4 Parish Councils. None of the higher tier Councils in England and Wales (i.e. excluding Parish Councils) that are NFLA members are currently hosting a nuclear legacy site.

As is the case with Nuleaf, the NFLA has a system of annual subscription based on size of Council. Presently, there is no equivalent to the Nuleaf Corresponding Members. Individual Councillors can also join from both member and non-member authorities.

Key message – Achieving greater recognition/a higher profile.

Nuleaf has a good reputation with NDA staff that engage with it, as it does with those LAs officers and members that are active members. Beyond that relatively close circle, the recognition and profile is less clear. One interviewee commented for example that the role of Nuleaf is not acknowledged at the senior level of the NDA or within some member LAs; although Nuleaf members meet annually with the NDA CEO and other senior staff regularly present to Nuleaf meetings.

An officer leading on operational nuclear issues in a LA had no knowledge of Nuleaf, although this was in an area with an active nuclear station rather than a decommissioning site. Significantly, within EDF Nuclear Operations, there is not a shared familiarity with the work of Nuleaf despite there being regular meetings between Nuleaf and senior comms and technical people involved in AGR decommissioning.

That some Contributing LA Members regularly have no Councillor representation at Steering Group meeting is notable, whether by choice or because they are simply unaware.

If a wider LA involvement and participation (with greater number of financially Contributing Members) is to occur, and if the nuclear legacy industry and Government is to be influenced by the views of Nuleaf, then the greater the profile and recognition the better.

In terms of wider communications, Nuleaf has completed an overhaul of its website in recent years, refreshed its logo and communications materials, and expanded its social media presence. The organisation maintains a comprehensive public web site, with information on Nuleaf, meetings and events, briefing papers, case studies, responses to consultations and Nuleaf commissioned reports. There is a member's section for Contributing Members.

Nuleaf publishes a regular Ebulletin four times a year, and a monthly newsletter, Forum which is sent to Contributing LA members (past issues are available on the public web site). This summarises recent news stories, recently issued reports, consultations in progress, forthcoming meeting dates and other items of note.

In addition, there are regular LinkedIn (LinkedIn privately listed with 77 members) and X feeds (264 followers on X) on matters of interest.

Following Covid, Nuleaf consulted members on ways of working, leading to the establishment of a two-day Annual Gathering, offering the opportunity for in-depth discussion and site visits along. Other meetings of the Steering Group and Radioactive Waste Planning Group and one-off workshops, are held online. Attendance

at Steering Group and RWPG consistently has representation from the majority of Contributing LAs along with a number of Corresponding LAs. Attendance at both meetings is at significantly higher levels than it was in 2016 – see above.

Nuleaf publishes an Annual Report that is sent to all Local Authority members and stakeholders; and a report setting out performance in delivering against agreed outputs and outcomes contained in the Annual Service Plan. As a Special Interest Group, Nuleaf also submits an annual report to the LGA and meets with the lead officer at the LGA as required. Nuleaf has in recent years worked through the LGA in other ways, for example in supporting NWS stands at the LGA and Welsh LGA conferences to encourage awareness of the GDF process.

Key Message – Resourcing the evolution

The ability for Nuleaf to facilitate, reach out, initiate and be proactive, to undertake a more proactive/leadership role and promote itself of course raises the question of resources. This needs to be achieved without it being at the cost of the existing services and support. Additional capacity is required in terms of time and expertise.

At present Nuleaf has a full time Executive Director, and part time Director's Assistant and has recently appointed a part time Co-ordinator for SCCORS (Scottish Council Committee on Radioactive Substances) – for one day a week they will also be available to support Nuleaf's work.

Two consultants are held on a retainer to cover meetings and workshops on behalf of the Director. Officers and councillors from member authorities represent Nuleaf on various national and international meetings and events.

In the financial year 2024-25 Nuleaf income totalled just under £180,000. Any significant increase in activity will require more Nuleaf resource, along with greater participation of member LA officers and members.

LA contributions, from increased Contributing Membership and/or increased membership fees

has some potential but given the low amount that LA fees currently represent of total Nuleaf funding (around 10%) and that LAs are as a whole challenged financially, there is very limited scope for this source of funding to increase significantly.

Given that NDA is keen to see Nuleaf be more proactive, there is scope for new and innovative ways of working. Moreover, international comparison shows the level of support for Nuleaf from the UK nuclear legacy industry to be relatively low compared to that in some other countries. NDA core support for Nuleaf has remained at the same level for several years, although additional funding has recently been committed to support Nuleaf to host the secretariat for SCCORS and to fund this consultancy research.

Direct comparisons with other countries are challenging – it is hard to compare like with like. In Spain, where the nuclear sector is much smaller, funding for AMAC (the equivalent body to Nuleaf) is provided through a Government requirement to provide support as an agreed proportion of overall nuclear programme costs. Spain has also established a formula to provide an equitable basis of assessing the direct support provided to individual communities.

It is recognised that the current financial settlement for NDA Group, as outlined in the 2025 Spending Review, is difficult. However, in considering future funding for engagement, the NDA should recognise what Nuleaf represents in terms of a large body of Local Authorities with a positive legitimate interest in and concern for matters of nuclear legacy, and that has the status of a LGA SIG. Nuleaf is increasingly working in ways that not just support its members but also support the NDA mission – for example in areas such as land use planning, biodiversity or socio-economics.

As EDF Nuclear Operations increasingly progresses towards hand over of the AGR fleet to NRS, as consultants we believe there is good reason to suggest that EDF core funding of Nuleaf is both appropriate and required.

In addition, there is the potential of income from the nuclear legacy industry funding for specific tasks/ purposes, with commissioning of work.

8: The Effectiveness of NDA Stakeholder Engagement across the NDA estate – Key Messages and Recommendations

Emanating from the research and interviews with stakeholders a number of key messages and recommendations relating to the future effectiveness of stakeholder engagement have been identified for future consideration by the Nuleaf Executive and members and NDA colleagues.

Key message 1 – Stakeholder engagement should be a core and suitably resourced component of future NDA strategy

It is clear from many of the national and international examples that stakeholder engagement has to be a core and key element of the NDA's strategy. As the NDA finalises its new strategy there is an expectation that this should further embed stakeholder engagement as a key priority. Examples show that positive stakeholder engagement which empowers communities to learn more about the projects and proposals being developed are not just intrinsically right but can potentially assist the NDA in delivering their objectives.

Nuleaf members have expressed the view that the NDA should increase the regularity of engagement with **all** interested communities. They would like to see a further commitment to engage with local stakeholders and local communities 'on the patch' utilising all communication and engagement techniques including social media but prioritising 'in person' meetings. In addition, Nuleaf members believe that Site Stakeholder Groups (SSGs), while important, are not necessarily the way to engage local authorities or indeed the wider community.

Recommendations – Future NDA Strategy

- a. Through discussion and consultation on the draft NDA Strategy 5, Nuleaf seek to ensure that stakeholder engagement is a core component of that strategy and request that support for engagement is enhanced.
- b. Nuleaf should encourage the NDA to establish a programme of regular 'in person' engagement activities with ALL interested communities.

Key message 2 – International comparisons have shown the benefit to the delivery of project objectives of well-resourced and managed stakeholder engagement

This report elsewhere highlights the role that Nuleaf plays and its access to local authorities, who are by their very nature at the heart of local communities. No other organisation has the profile that enables it to access local authorities. Nuleaf and the NDA should consider how Nuleaf might further assist the NDA in accessing local communities through more effective local stakeholder engagement. Through this arrangement Nuleaf will be able to assist the NDA in establishing more regular regional/local stakeholder meetings. In addition, it is recommended that Nuleaf could work with the NDA to prepare an annual progress report to local Councils and other local stakeholders, covering progress with the national mission as well as the process for decommissioning local sites. This could build on the NDA Mission Progress report², which Nuleaf has welcomed.

As mentioned earlier, local authorities have good access to communities and local groups. However, individual Councils lack the resources to fully engage with the NDA around the subject of decommissioning and waste management and to facilitate local community/

2 <https://www.gov.uk/government/publications/the-nuclear-decommissioning-authority-mission-progress-report-2024>

group engagement. It is recommended that the NDA provide local authorities with the resources (through a formal Community Hosting Agreement) to support full participation in plans for the local area and to underpin engagement with local groups. It has been evidenced internationally to enhance delivery of plans on the ground.

International examples show that RWMCo's have enabled and facilitated discussion between local authorities and central government. Nuclear legacy decommissioning is viewed in most countries as a national priority and local communities that are implicated often lack the ability to engage with central government officials and Ministers. The NDA and UK/Devolved Government could provide the route to expanding this activity for Nuleaf, enhancing prospects of local understanding of the national importance of the mission but also enabling central government to appreciate the perspectives presented by local communities.

It is further proposed that there is engagement between the NDA, Nuleaf and local communities around the relationship between local authorities and the NDA-promoted Site Stakeholder Groups (SSGs). SSGs, can and should have the potential to provide a complimentary role to Nuleaf-led local authority engagement. Discussions could potentially lead to the development of a protocol setting out the respective roles and ways of working of each element of the engagement landscape.

Recommendations – Enhancing Engagement

- a. That Nuleaf explores with the NDA in the opportunities to deliver further local stakeholder engagement through utilising the specific Nuleaf relationships with local authorities.
- b. That Nuleaf works with the NDA to explore the potential for the development of Community Hosting Agreements to help underpin local engagement.
- c. That the NDA supports Nuleaf in enhancing engagement with central government departments where appropriate.

- d. That Nuleaf and the NDA enter into dialogue and seek to establish a protocol which articulates the relationship between NDA, Nuleaf, local communities and SSGs.
- e. That Nuleaf becomes more active as an advocate for a local government position on nuclear issues, through 'Thought leadership' and proactive engagement in press, TV/radio and social media discussions.

Key message 3 – Local communities close to NDA-owned facilities require additional information about process and timescales relating to the decommissioning of the site

The research has shown that communities near former nuclear power generating facilities undergoing decommissioning are keen to understand the facts of what is to happen, and to help shape the delivery of the decommissioning and eventual future use of the site. Also important is to understand the proposed timescale of that process, noting that such timescales can be across several decades and potentially subject to uncertainties and changes.

Recommendation – Delivering information

- a. Nuleaf should support dialogue with the NDA to review the scope and regularity of information made available to local communities to meet community needs.

Key message 4 – Opportunities should be explored to encourage greater individual and group participation at the local level

A key element of the NDA's annual stakeholder engagement plan is the Stakeholder Summit. Nuleaf is keen to help the NDA to review the scope and delivery of the Stakeholder Summit to achieve a more effective engagement and ensure the best use of the resources employed.

Nuleaf members believe that the NDA should support locally designed engagement processes. Techniques of Deliberative Citizen Participation, as analysed in

a recent NDA-funded study, could be considered for use by both the NDA and local Councils within NDA communities, to achieve enhanced engagement.

Recommendations – Encouraging greater participation

- a. Nuleaf should work with the NDA to help review the scope and delivery of the annual NDA Stakeholder Summit, ensuring it offers best value for money in terms of local government and community engagement.
- b. Nuleaf, its member authorities and the NDA should consider further locally designed engagement processes and the potential for the use of Deliberative Citizen Participation techniques.

Key message 5 – Regularising and defining the scope of engagement and socio-economic support for local communities through the provision of 'Community Hosting Agreements'

International comparisons show that local communities understand the socio-economic benefits of hosting former nuclear power facilities. They appreciate the value that can be accrued by the local business community through a positive approach to procuring local businesses and individuals to support the delivery of site plans. Nuleaf members see this aspect as an important component of local economic strategies and recommend that the NDA build on its existing commitments to local sourcing and procurement, working with local authorities.

Nuleaf would recommend that the NDA consider the provision of 'Community Hosting Agreements' with all interested communities. These would set out in a clear way commitments around engagement and local socio-

economic support, building on the NDA's Social Impact and Communities Strategy and associated funding and support. The scope of such agreements could include the provision of locally generated 'statements of support' as used in some international communities where RWMCo proposals are subject to local debate.

Recommendations – Socio-economic support

- a. Nuleaf should seek commitment from the NDA to review the provision of socio-economic support to all local hosting communities as part of the process of preparing its next Social Impact and Communities Strategy.
- b. Nuleaf should encourage the NDA to provide 'Community Hosting Agreements' with local stakeholders to regularise the approach to engagement and socio-economic support across all NDA communities.

Key Message 6 – Commitment to delivery is a common concern across international comparison communities

The research has shown that there is a common concern that plans agreed with local communities are often subject to delay and change. In order to enhance commitment and to see progress made, some RWMCos have entered into legally binding agreements to deliver specific project components and milestones within an agreed timescale. Nuleaf recommends that such a mechanism is considered by the NDA for use in England and Wales.

Recommendations – Enhancing commitment

- a. Nuleaf should encourage the NDA to review the potential for utilising agreements with local authorities/communities to underpin plans agreed with the community stakeholders.

9: The Effectiveness of Nuleaf Representing Local Authorities – Conclusions and Recommendations

The 8 themes, as areas for evolution of Nuleaf, that emerged from the research, have been taken as a basis for an integrated package of suggestions for evolution and recommendations that cover:

1. Celebrating/acknowledging what Nuleaf already brings
2. Increasing the reach across LAs working with nuclear legacy
3. A more proactive, leadership role
4. More active LA participation
5. Working with New Nuclear LAs
6. The relationship with NFLA
7. Achieving greater recognition/a higher profile.
8. Lastly, and key, resourcing this evolution

Conclusions – Celebrating/acknowledging what Nuleaf already brings

Nuleaf can be justifiably proud of what it has achieved and is achieving.

Nonetheless, it is entirely appropriate and important not to be complacent, but rather to build on these strengths and to consider how Nuleaf can be even more effective, not least given the changing context for both local government and the nuclear sector.

Conclusions – Increasing the reach across Local Authorities working with nuclear legacy.

Suggestions for evolution

There is no doubt that having the status of a LGA Special Interest Group with such a large total membership is a great strength. It confirms the status of Nuleaf as the key network representing LAs in nuclear legacy issues across England and Wales.

It is the Contributing Members that manage and shape the organisation and its' policies and responses and which drive the organisation forward. Consequently, the higher the number of Contributing Members, the greater the extent to which Nuleaf can truly represent the views of local government.

Most if not all LAs will need to agree contributions to outside bodies such as Nuleaf as part of their annual budget setting process, with the need to justify the membership fee. Whilst on the face of it modest, such are the financial difficulties being faced currently by local government that this discretionary expenditure may well be a significant barrier to a greater take up of Contributing membership. A LA that is a notable omission as a Contributing Member, with a major nuclear presence in their area, specially cited the membership fee as an issue.

In a Council's annual budget setting, the ability to make the case effectively for payment of the membership fee will be critical. This requires that there is information to LAs as to what Nuleaf achieves and provides. It also requires that information is disseminated from the officer or councillor contacts and there is internal communication between officer and councillors. This internal communication is variable, judged by the responses of members LAs.

An option would be not to have a membership fee – to do so would remove any financial barrier to taking up full membership. However, it would represent a loss of income and more importantly would arguably erode an important distinction between LAs that are committing to Nuleaf and supporting its' work directly versus those that welcome its existence but stand back from active involvement/support.

Another factor to consider is that a Corresponding Member LA has access to most of the information resource of Nuleaf. They can attend meetings and take part in discussion, albeit they cannot vote on policy matters, and they don't have access to the shared documents/policy resources. As set out elsewhere,

at present the latter member only benefits are undeveloped and the newsletter available to all (via the open section of the web site).

It could be said therefore that there is a relatively limited incentive to pay the subscription. Access to information and meetings could be more restricted. This may incentivise LAs to become Contributing Members, particularly those that are Corresponding Members but attend meetings. More likely, however, would be a drop off in total membership because of reduced benefits, which would undermine the ability of Nuleaf to speak as representative of LAs across the nuclear legacy locations of Wales and England.

Far better therefore, to consider how the benefits of being a Contributing Member can be enhanced, based on what Nuleaf members identify as positive benefits. These include a functioning and up to date shared information repository, greater advice and help on local policy development, additional facilitated topic focussed workshops, further site visits, and mentoring of officers and councillors.

Very much in line with this approach, in a number of instances in recent years the Executive Director has reached out directly to Local Authority officers and councillors setting out the case for membership. In some cases, this has led to them joining, confirming that positive promotion is effective.

These conclusions and the recommendations that follow, are very closely related to Nuleaf taking a more proactive leadership role and more active LA participation – see below. It is recognised that additional resources will be required.

Recommendations – Increasing the reach across LAs working with nuclear legacy

- a. There is much to celebrate in what Nuleaf achieves and delivers and the influencing role that comes with 'full membership'. There is thus a strong basis for continuing and extending promotion of Contributing Membership particularly amongst current Corresponding Members and also non-member LAs.
- b. This should include encouragement and support to participating officers and councillors to consistently disseminate information about Nuleaf and its' work to their colleagues within their own and other LAs.
- c. Consideration should be given to further development of member benefits. These could include a functioning and up to date shared information repository and adding to the existing advice given on local policy development, with additional facilitated topic focussed workshops, site visits and mentoring of officers and councillors. It is recognised that all these options require additional staff and financial resources.

Conclusions – A More Proactive Leadership

Suggestions for Evolution

There are two aspects of Nuleaf being more proactive. Firstly, helping shape the strategies and policies of its member local authorities and, secondly, helping shape the development of the nuclear legacy sector's policies and strategies in the interest of local authorities and their communities. These two outcomes are of course very related but also different in what they require and how they could be achieved. Both are important in enhancing the effectiveness of Nuleaf.

Working with the nuclear legacy sector in a more collaborative/problem solving role could be done with the commissioning of specific work, or, for example, being tasked with reporting on particular topics.

A very positive role for Nuleaf is being closely engaged in the development of policies before they are formed rather than a consultee after they have been drafted. Nuleaf is already one of a small number of organisations that sits on the NDA Strategy 5 Development Group (S5DG) and on a range of Theme Overview Groups (TOGs) and other fora. Exploring additional opportunities for similar participation with the NDA and other partners would be mutually positive.

In terms of membership support, developing (in consultation with the whole membership) a programme of round table type workshop sessions designed to

bring about active participation on topics of interest could be very positive. These could complement or replace some current Nuleaf meetings.

A specific suggestion of some councils that events hosted 'on the patch' by a member LA may be particularly effective, not least in reinforcing local context to national policies and drawing in that LA's officers and councillors. Such workshops could be proactively facilitated by Nuleaf to bring together a range of other organisations on a topic, not a single organisation conversation, with Nuleaf, taking the lead.

Nuleaf has already held a number of successful one-off workshops, for example on AMRs, with speakers from the National Nuclear Laboratory (NNL), NDA, NFLA/University of Greenwich, ONR and others; or the workshop on socio-economics at the Annual Gathering 2024 involving Gwynedd Council, Cwmni Eginio and Menter Mon. These successes demonstrate the scope to do more, subject of course to resources (see below).

A specific request, one that has potential, is that Nuleaf, with its knowledge and contacts in the nuclear legacy industry, further helps LAs identify training opportunities by way of meetings and events to attend. Nuleaf already circulates information on a range of NDA/ stakeholder events and international online meetings, but these do not tend to cover training per se.

Mentoring, on a more formal and structured basis, of nuclear specialist officers and councillors within local authorities is another area of potential, it being clearly welcomed where it has occurred informally to date. Mentoring helps officers gain the required knowledge in what can seem (as mentioned by a newly active member Council) a subject area that requires knowledge, understanding of terminology and contacts that can't be assumed.

Support in breaking down barriers to involvement in the issues of nuclear legacy may well be a very positive reason for LAs to be active with Nuleaf. Unfamiliarity with the issue of nuclear legacy may itself discourage active participation.

The more that is understood about nuclear legacy issues and its national significance, the greater the appreciation as to why it is important for a local Authority to be involved with the issue and seeking to influence – which is what Nuleaf provides.

A more proactive leadership role for Nuleaf is very much consistent with the key messages and recommendations elsewhere in this study in relation to the effectiveness of NDA Stakeholder Engagement across the NDA estate.

Recommendations – A more proactive/ leadership role

- a. A more proactive leadership role, to complement and build on existing activity, to facilitate debate and policy development, to reach out to and proactively bring together a wide range of organisations that are decision makers/ influencers/stakeholders in nuclear legacy.
- b. To seek an expansion of the current collaborative problem solving/policy formulation role that Nuleaf plays with the nuclear legacy sector.
- c. Even greater use of workshops, potentially hosted locally, exploiting and drawing out the views and knowledge of member local authorities.
- d. A more formal/structured mentoring capability to assist new LA members in their development of core knowledge of nuclear legacy and the organisations involved.
- e. Proactive identification of nuclear legacy related training and knowledge opportunities for Nuleaf member LAs.
- f. Nuleaf should engage with the NDA to explore how Nuleaf can be a useful 'bridge' to the wider LGA family.
- g. That Nuleaf becomes more active as an advocate for a local government position on nuclear issues, through 'Thought leadership' and proactive engagement in press, TV/radio and social media discussions.

Conclusions – More Active Local Authority Participation

Suggestions for Evolution

Nuleaf greatest asset is its membership. A key question is how the Nuleaf membership can support the organisation's evolution to be more proactive in collective activity – given the undoubted benefits of sharing best practice, to mentor and support other local authorities, to work collaboratively on shared issues.

In other words, how can greater active participation of the membership be achieved? With such large and broad-based membership, and with a strong core of Contributing Members, there is enormous potential in this.

The Nuleaf web site currently has a Member's section with which Contributing Member LAs are able to securely share documents, with three categories – consultation response, planning and socio-economics. However, there are very few documents posted on each of these, and nothing recent despite the efforts of the Nuleaf Secretariat to encourage use. It does not meet the intended purpose. This is even though a number of Local Authorities specifically identified such a resource as important to have.

What could and should be an important part of being a member, access to a shared resource of learning and development, is undeveloped, so reducing the incentive to being a Contributing Member and the ability of LAs to learn from each other.

To summarise, it is from member LAs that mentoring would be provided, officer to officer; it is from the active contribution of officers and members that the policies and responses of Nuleaf can be enhanced and made even more representative; and it is from officers and from councillors already attending Nuleaf meetings that support, and encouragement could be given to others to attend Steering Group meetings. Together, these and some other recommendations in this report would bolster the incentive of being a Contributing Member Local Authority.

Recommendations – More Active LA Participation

- a. More active LA member participation with both greater commitment and contribution from the LA member authorities, on the basis that the more that is contributed the more that is collectively gained.
- b. To initiate and maintain greater contribution requires additional proactive support to establish and maintain it, with Nuleaf as a facilitator/organiser.
- c. Examples of initiatives for member Local Authorities to progress collectively include:
 - i. An up to date and comprehensive shared online resources of nuclear legacy related Local Authority policies and strategies.
 - ii. A proactive mentoring of LA officers and Councillors new to the nuclear legacy sector or currently not attending meetings.

Conclusions – Working with New Nuclear Local Authorities

Suggestions for Evolution

Given the established remit of Nuleaf, there is significant scope to engage with the new nuclear agenda in so far as there are implications for legacy nuclear sites and waste management. This is already reflected in the work of Nuleaf, with potential to do more.

Whilst there is a significant cross over between nuclear legacy and new nuclear there are important differences, not least that it is likely that new nuclear now won't be only on or adjacent to nuclear legacy sites.

It is clear why NFLA members are cautious about the relationship between nuclear legacy issues and new nuclear, and that may also be true of other LAs not members of NFLA. Being a 'broad church' has long been a strength of Nuleaf, and the substantial total of members is testimony to the broad appeal of the organisation with its' current remit and objectives.

Nuleaf has recently recruited a Co-ordinator for their sister organisation in Scotland, SCCORS (Scottish Council Committee on Radioactive Substances).

Given that in Scotland there is no policy to support new nuclear, there is a possibility that Scottish LAs are less likely than in England and Wales to want to have any involvement, albeit indirectly, in new nuclear. It is also worth noting that NFLA membership is proportionally greater in Scotland than in England and Wales, further suggesting that a clear focus on nuclear legacy is important.

If Nuleaf is perceived to be promoting new nuclear, rather than responding to the implications it may have for nuclear legacy, the membership/association with Nuleaf for Local Authorities that are against or ambivalent in relation to new nuclear may become less tenable. At the same time, many Nuleaf members are already engaged in new nuclear discussions alongside their work on decommissioning and waste management. The New Nuclear Local Authority Group (NNLAG) is, as noted earlier, is made up almost entirely of Nuleaf Contributing members. They, and NNLAG, are clear that their role is not to 'promote' new nuclear but to ensure the local authority voice is heard and the best outcomes are delivered for the community.

Taking the views of the Nuleaf membership, including the concerns of NFLA members, closer working between Nuleaf and NNLAG is less likely to be a concern if the support is simply to provide secretariat resources with NNLAG, as has been suggested in the past. The secretariat support for SCCORS (which will retain a separate Convenor and for which additional resources are provided – in that instance by NDA) potentially provides a model for a joint secretariat with NNLAG.

It is important to note that NNLAG currently has limited secretariat resources. To provide secretariat support for NNLAG without additional resources, to share the existing resource, would impact negatively on work capacity and capability.

Given the potential sensitivities of the issues, providing secretarial support could be tested by asking the membership – Contributing and Corresponding

Members, with this also being explored through dialogue with NDA, as the main funder, and other key stakeholders.

Recommendations- Working with New Nuclear Local Authorities

- a. Explore the potential to provide secretariat support for NNLAG – after having asked the existing Nuleaf Membership (Contributing and potentially Corresponding members as well) for their views; and
- b. On the basis that additional new resources are available, from outside the NDA Group, to provide that support.

Conclusions – The Relationship with Nuclear Free Local Authorities (NFLA)

Suggestions for Evolution

NFLA has over time gained a Non-Governmental Organisation (NGO) status in the nuclear debate, notwithstanding that it represents local authorities rather than the third sector.

NFLA is a member of several NGO forums, using this along with direct approaches and publicity of its cause to make its case. NFLA was given a role at the 2024 NDA summit in an NGO session.

The NFLA have recently called for direct NDA funding for NGOs (including NFLA), citing the level of funding provided by the NDA to Nuleaf. They stated in a press release dated 19th September 2024 that '*the NDA should look to distribute an annual block grant to NGOs and to the NFLAs for their contribution as 'critical friends' to the Authority's mission.*' One issue around this is that pro-nuclear NGOs are currently not part of the NGO forums.

There is a diversity of view on the role of NFLA from those engaged in this research. On the one hand there is a recognition of the need to engage with NGOs and others opposed to or critical of nuclear operations. On the other a degree of uncertainty as to who they represent and their standing relative to Nuleaf, with the sense that some see the NFLA as being as representative of LAs as Nuleaf is.

There is now no special status for NFLA Councils within Nuleaf's constitution (see above) but it is entirely open to NFLA Councils to be Contributing or Corresponding Members, providing for their views to be represented. Currently, 4 NFLA LAs have chosen to be a Corresponding Member.

There is not as such a need for further action on the relationship between Nuleaf and NFLA.

However, it is important that the nuclear legacy industry recognises two very significant differences between the two organisations. This is in terms of (a) their remit and purpose and (b) the degree to which they are representative of LAs and communities hosting nuclear legacy.

Recommendations – The Relationship with Nuclear Free Local Authorities (NFLA)

- a. The NDA and the nuclear legacy industry as a whole needs to distinguish between Nuleaf which is a broad based Local Authority LGA Special Interest Group seeking to support LAs dealing with nuclear legacy, as opposed to the NFLA, a much smaller organisation not representing District, County or Unitary Councils hosting nuclear legacy in England and Wales. The NFLA specifically campaigns against the civil nuclear programme, including NDA objectives such as a GDF.
- b. It is important that this is both recognised and reflected in how NDA and others work with the two organisations and the status given to their views.
- c. Linked to this, it is key that Nuleaf promotes itself as a representative body, working with a clear remit and primary objectives to further the views of LAs in working with nuclear legacy in England and Wales.

Conclusions – Achieving greater recognition/higher profile.

Suggestions for Evolution

There is a significant amount of communication from Nuleaf, and this has been increasing in recent times, for example with effective use of social media.

Nonetheless, there is inevitably scope to do more. For example, NFLA has a relatively higher profile in web searches.

The Executive Director of Nuleaf has confirmed that he would like Nuleaf to be more active in the wider media, but a constraint has to date been that it is hard to express opinions on certain things given the divergence of views of Members, from NFLA members to authorities that are neutral or pro nuclear. As the Director recognises and as outlined above, this has changed with the constitutional changes now in place not giving NFLA LAs a special status in Nuleaf.

In other words, the way is now clear to be more proactive, to give a view, to have a profile – not as an advocate for the nuclear legacy industry but working within the remit and prime objectives to facilitate and make the case for local authorities to be shaping nuclear legacy decisions for the benefit of their communities.

It is not of course just about 'external' communications from Nuleaf, but also how LA members communicate internally. Whilst a number of member LAs have a well-developed system of dissemination of information from Nuleaf to their Councils others do not, to the extent that an officer significantly involved with operational nuclear for a LA was unaware of Nuleaf.

Addressing this is both about encouraging officers and councillors to disseminate information and giving them the tools to do so, making information as accessible and relevant as possible.

Recommendations – Achieving greater recognition/a higher profile.

- a. A more proactive programme of positive and proactive external communication.
- b. A clear and consistent statement of remit and purpose.
- c. Demonstration of the added value that Nuleaf gives to the development of policies and strategies for nuclear legacy and outcomes achieved.
- d. Confirming and drawing on the substantial Local Authority membership that Nuleaf represents across England and Wales.

Conclusions – Resourcing the evolution

Suggestions for Evolution

Additional resources are needed for Nuleaf to be more proactive, take a greater leadership role and generally to be even more effective – indeed, for the majority of the recommendations above. It is recognised that the securing of additional resources may prove challenging in the current climate, but there is scope to look to new funding sources and also to engage with NDA to explore whether there are opportunities to make existing engagement funds deliver more through new ways of working.

Such resources may come in part from increased LA Contributing Membership but will need to come predominately from the nuclear legacy industry – across a broader spectrum of that industry than at present.

Without doubt, an effective Nuleaf is important for the nuclear legacy industry. It provides a strong basis to engage with a large body of LA stakeholders, in particular even greater engagement facilitated by Nuleaf with LAs would help to get the key messages of the NDA mission over to local communities. There is significant positive scope to further exploit what Nuleaf provides in terms of representing nuclear legacy Local Authorities and communities.

Resourcing from the NDA, NRS, NWS, EDF Nuclear Operations and the wider industry need to be commensurate with and appropriate to a recognition that Nuleaf is the representative body of English and Welsh LAs on nuclear legacy, consistent with its' remit and primary objectives.

Given Great British Nuclear 's (GBN) responsibility for driving delivery of new nuclear projects has implications for nuclear legacy consistent with Nuleaf's remit, it may well be appropriate (with clear explanation and definition of the purpose) to seek funding from GBN.

Of course, funders need to be clear as to the outcomes of their funding.

The Executive Director has confirmed that the degree to which industry funders have sought formal agreements with Nuleaf has varied over time. There is not a Memorandum of Understanding (MoU) for the current financial year.

To give clarity and certainty for both Nuleaf and funders, especially if greater levels of funding are being given based on specified roles or project, a degree of formality is required by way of a shared understanding, such as a MoU. Specific commissions for pieces of work, such as policy development, could be incorporated into MoUs.

Recommendations – Resourcing Evolution

- a. To be a more effective organisation Nuleaf require more resources in terms of staff and funding. The present resource level is not sufficient to take on significant additional work.
- b. It is recognised that these are challenging times for the NDA Group in terms of its finance. That said, resourcing from the nuclear legacy industry needs to be commensurate with and appropriate to a recognition that Nuleaf is the representative body of English and Welsh LAs in nuclear legacy, and provides great value to NDA Group in helping delivery of its mission.
- c. Funding could be accompanied by MoUs to give clarity and certainty for both Nuleaf and funders.

10: Overall Conclusions and Recommendations

This study seeks to provide the basis for a Nuleaf view of the effectiveness of stakeholder engagement delivered by the Nuclear Decommissioning Authority (NDA).

Consistent with this purpose, the study has identified through extensive interviews with key stakeholders and research, significant positive opportunity (as set out above) for:

- a. The NDA to enhance the effectiveness of Stakeholder Engagement across the NDA estate.
- b. Nuleaf to evolve to become an even more effective organisation representing local authorities and communities dealing with Nuclear Legacy.

These two areas of recommendations are set out below. They are of course very much related, as a positive set of interdependent measures.

A. The Effectiveness of NDA Stakeholder Engagement across the NDA estate

Recommendations – Future NDA Strategy

- a. Through discussion and consultation on the draft NDA Strategy 5, Nuleaf seek to ensure that stakeholder engagement is a core component of that strategy and request that the resources to carry out stakeholder activities delivering this objective are enhanced.
- b. Nuleaf should encourage the NDA to establish a programme of regular 'in person' engagement activities with ALL interested communities.

Recommendations – Enhancing Engagement

- c. That Nuleaf offers to support the NDA in delivering further local stakeholder engagement through utilising the specific Nuleaf relationships with local authorities.
- d. That Nuleaf request NDA to consider resourcing local authorities to enable them to fully participate in discussions with the NDA and to support local stakeholder engagement delivery.

- e. That the NDA supports Nuleaf in enhancing engagement with central government departments where appropriate.
- f. That Nuleaf and the NDA seek to establish a protocol which articulates the relationship between NDA, Nuleaf, local communities and SSGs.

Recommendation – Delivering information

- g. Nuleaf should encourage the NDA to review the scope and regularity of information made available to local communities to meet community needs.

Recommendations – Encouraging greater participation

- h. Nuleaf should work with the NDA to review the scope and delivery of the annual NDA Stakeholder Summit.
- i. Nuleaf should encourage NDA to support locally designed engagement processes, that complement the NDA's and local authority's activities which would provide an opportunity to include more critical voices.
- j. Nuleaf, its member authorities and the NDA should consider Deliberative Citizen Participation techniques and similar techniques which have the potential to enhance engagement.

Recommendations – Socio-economic support

- k. Nuleaf should work with NDA in the development of the next Social Impact and Communities Strategy to ensure it further progresses the provision of socio economic support to all impacted communities.
- l. Nuleaf should encourage the NDA to provide 'Community Hosting Agreements' with local stakeholders to regularise the approach to engagement and socio-economic support across all NDA communities. As noted, work has already been undertaken around a CHA between Lincolnshire County Council and the NDA around the local GDF process.

Recommendations – Enhancing commitment

- m. Nuleaf should encourage the NDA to review the potential for utilising legal agreements with local communities to ensure commitment to delivery.

B. Recommendations for the Effectiveness of Nuleaf

Recommendations – Increasing the reach across Local Authorities working with nuclear legacy

- a. In the knowledge that there is much to celebrate in what Nuleaf achieves and delivers and the influencing role that comes with 'full membership', there is a strong basis for continuing and extending the promotion of Contributing Membership particularly amongst currently Corresponding Members and non-member LAs.
- b. This should include encouragement and support to participating officers and councillors to consistently disseminate information about Nuleaf and its' work to their colleagues within their own and other LAs.
- c. This to be accompanied by the further development of member benefits. These could include a functioning and up to date shared information repository and adding to the existing advice given on local policy development, with additional facilitated topic focussed workshops, site visits and mentoring of officers and councillors.

Recommendations – A more proactive/ leadership role

- d. A more proactive leadership role, to complement and build on existing activity, to facilitate debate and policy development, to reach out to and proactively bring together a wide range of organisations that are decision makers/ influencers/stakeholders in nuclear legacy.
- e. To actively seek a collaborative problem solving/ policy formulation role working with the nuclear legacy sector.

- f. Even greater use of workshops, potentially hosted at a local level, rather than on-line meetings, exploiting and drawing out the views and knowledge of member local authorities.
- g. A more formal/structured mentoring capability to assist new LA members in their development of core knowledge of nuclear legacy and the organisations involved.
- h. Proactive identification of nuclear legacy related training and knowledge opportunities for Nuleaf member LAs.
- i. Work with the NDA to explore how Nuleaf can be a useful 'bridge' to the wider LGA family.
- j. Become more active as an advocate for a local government position on nuclear issues, through 'Thought leadership' and proactive engagement in press, TV/radio and social media discussions.

Recommendations – More Active Local Authority Participation

- k. More active LA member participation with both greater commitment and contribution from the LA member authorities, on the basis that the more that is contributed the more that is collectively gained.
- l. To initiate and maintain greater contribution requires additional proactive support to establish and maintain it from Nuleaf as a facilitator/ organiser.
- m. Examples of initiatives for member Local Authorities to progress collectively include:
 - i. An up to date and comprehensive shared online resources of nuclear legacy related Local Authority policies and strategies.
 - ii. A proactive mentoring of LA officers and Councillors new to the nuclear legacy sector or currently not attending meetings.

Recommendations- Working with New Nuclear Local Authorities

- n. Explore the potential to provide secretariat support for NNLAG – after having asked the existing Nuleaf Membership (Contributing and potentially Corresponding members) for their views; and
- o. On the basis that additional new resources are provided to provide that support.

Recommendations – The Relationship with Nuclear Free Local Authorities (NFLA)

- p. The NDA and the nuclear legacy industry as a whole needs to distinguish between Nuleaf which is a broad based Local Authority LGA Special Interest Group seeking to support LAs dealing with nuclear legacy, as opposed to the NFLA. This is a much smaller organisation not representing District, County or Unitary Councils hosting nuclear legacy in England and Wales and which campaigns against the civil nuclear programme, including NDA objectives such as GDF.
- q. It is important that this is recognised and reflected in how NDA and others work with the two organisations and the status given to their views.
- r. Linked to this, it is key that Nuleaf promotes itself as a representative body, working with a clear remit and primary objectives to further the views of LAs in working with nuclear legacy in England and Wales. Nuleaf should engage with the NDA to explore how Nuleaf can be a useful 'bridge' to the wider LGA family.

Recommendations – Achieving greater recognition/a higher profile.

- s. Instigation of a more proactive programme of positive and proactive 'internal' communication (to the membership) and in particular external communication.

- t. A clear and consistent statement of remit and purpose.
- u. Demonstration of the added value that Nuleaf gives to the development of policies and strategies for nuclear legacy and outcomes achieved.
- v. Confirming and drawing on the substantial Local Authority membership that it represents across England and Wales.

Recommendations – Resourcing Evolution

- w. To be a more effective organisation Nuleaf requires more resources, to increase the people resource and support additional and different types of events. With the present resource level it is not possible to take on significant additional work.
- x. Resourcing from the nuclear legacy industry needs to be based on a recognition that Nuleaf is the representative body of English and Welsh LAs in nuclear legacy. Nuleaf should also consider the scope for enhanced resourcing from its members or other sources.
- y. Increased funding levels could be accompanied by MOUs to give clarity and certainty for both Nuleaf and funders.

About the authors

Steve Smith has over 40 years' experience working in local government, the last 15 years advising local authorities impacted by nuclear and radioactive waste issues.

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The Nuleaf View

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