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Dear Sir/Madam,

## **Draft NDA Business Plan 2026-29 Consultation: Response from Nuleaf**

### **1. Introduction**

1.1 This is an organisational response submitted on behalf of Nuleaf (the Nuclear Legacy Advisory Forum). We are the Local Government Association (LGA) representative body on legacy wastes and decommissioning. Nuleaf is directly supported by 100 local authorities and national park authorities across England and Wales and speak on these issues for the wider local government community. We have a remit encompassing all aspects of the management of the UK's nuclear waste legacy. Our primary objectives are:

- to provide a mechanism to identify, where possible, a common, local government viewpoint on nuclear legacy management issues;
- to represent that viewpoint, or the range of views of its member authorities, in discussion with national bodies, including Government, the NDA and the regulators;
- to seek to influence policy and strategy for nuclear legacy management in the interests of affected communities; and
- to develop the capacity of its member authorities to engage with nuclear legacy management at a local level.

1.2 Nuleaf is funded by NDA Group and our member councils. We sit on the Strategy 5 Development Group (S5DG) and a range of Theme Overview Groups (TOGs) and other fora. Through our meetings we provide an opportunity for the NDA Group to



meet and explore with the local government community how best to take forward policy, strategy and practice.

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

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

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

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



1.5 Finally, through local government reorganisation the landscape for stakeholder engagement continues to evolve. Nuleaf can help the NDA Group develop its connections with new host local authorities that arise in future. We can also assist in engaging Mayoral/Combined authorities and strategic regional networks on nuclear.

## 2. The consultation process

2.1 The consultation period for the draft Business Plan is short – only 8 weeks including the Christmas holiday period. As a member organisation this has presented challenges to us in ensuring that councils are properly engaged in the development of our response. Local authorities often have to share draft responses with a number of Members and staff, and this takes time. We continue to **recommend that a 12 week consultation period is provided for future consultations.**

2.2 Due to similar challenges with the consultation timing and duration, the SCCORS secretariat has been unable to engage with its members but has provided feedback for inclusion in the Nuleaf response, on behalf of their Scottish local authority members.

## 3. Overall Comments

3.1 In this section we offer comments on some general themes of importance to local authorities and communities. Here, and elsewhere in this response, key comments and requested changes are highlighted in **bold** for ease of reference.

### Engagement with local government and communities

3.2 As David Peattie notes in his introduction, 2025 marked the 20<sup>th</sup> anniversary of the NDA. It also marked the 20<sup>th</sup> anniversary of Nuleaf, and we were able to mark both these milestones, with David Peattie, at our Annual Gathering last summer.

3.3 This Business Plan is the first prepared since the 2025 Spending Review, which offered clarity in terms of funding until the end of this decade, and set out expectations around efficiency and the prioritisation of frontline action. This in turn has led to changes within the NDA and the departure of a significant number of staff under the MAVE scheme.

3.4 Nuleaf is supportive of a clear focus on the remediation of sites and waste management. We believe that stakeholders, and particularly local authorities, are critical partners in this. Engagement and the socio-economic support of host



communities are rightly identified in this draft plan as Critical Enablers (CEs) and are legal requirements under the Energy Act (2004).

3.5 Our members have expressed concern at the recent loss of engagement staff across the NDA Group and have sought reassurance about the ongoing level of support for engagement and the provision of socio-economic value. Our international engagement, and recent independent consultancy research<sup>1</sup>, has highlighted that the UK could learn innovative practices from other nations, particularly around deliberative democracy and the development of formal agreements between the NDA Group, councils and communities.

3.6 We believe that there should be regular **dialogue between the NDA and Nuleaf members on forward plans for engagement over coming months. This dialogue must be early and significant in nature, as this way it will maximise the scope to put in place arrangements that ensure effectiveness in future approaches.**

### **Socio-economics, social value and sustainability**

3.7 The activities through which the NDA impacts on the socio-economic health of host communities are only referenced in a limited way in the draft Business Plan, with no specifics and no Case Study.

3.8 The draft Plan offers no clear pathway for how individual sites can be integrated into other long-term economic, environmental, or energy strategies. Instead, it adopts a narrowly technical focus—concentrating on ILW consolidation, de-planting and demolition activities—without setting out how these actions could be aligned with wider place-making or regional development. There is an absence of any reference to opportunities such as clean energy hubs, ecosystem restoration or integration with regional strategies, meaning the plan falls short in enabling joined-up thinking.

3.9 There is also no information on how the NDA or NRS will interface with Great British Energy - Nuclear (GBE-N) and private nuclear developers, or indeed with other developers such as at Chapelcross. In fact, we could find no reference to GBE-N and only very limited reference to the UK Government's wider nuclear plans. Given the recent announcements around Sizewell C and Wylfa, and the considerable interest in new nuclear at other sites such as Oldbury, we find this surprising.

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<sup>1</sup> <https://www.nuleaf.org.uk/policy-communications/reports/>



**3.10 The Business Plan should include more information on socio-economics. The Plan should also set out how the NDA, working with local authorities, national/devolved government and GBE-N can support the UK's clean energy future, both at a national level and within the sections on sites such as Oldbury and Wylfa.**

## **Reporting**

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

3.12 We understand that work around targets and reporting is progressing and so it **would be helpful to have reference to that here.**

## **4. The NDA and our Mission – and Vision**

4.1 This section provides a useful explanation of the overall NDA mission, the location of existing and future NDA sites, and the component parts of the NDA.

4.2 One of the three elements of the Vision (p.16) is that the NDA should be '*Trusted to do more in the UK and globally.*' There is little reference within the Business Plan to the NDA's international activities, and **an explanation as to how the NDA is being trusted to do more outside the UK would be helpful.**

## **5. Our Funding**

5.1 The 2025 Spending Review settlement has given a degree of clarity to the NDA's income and expenditure over the three years that this Business Plan covers. This is welcome – we have long called for multi-year provision as it enables longer term planning decisions to be made. **We believe that this principle of multi-year settlements should be extended to bodies that the NDA Group provide funding for, such as Nuleaf, and would welcome discussion around this. Such an agreement would deliver efficiency and effectiveness to the work of Nuleaf and our support for the NDA mission.**



5.2 The Business Plan shows that funding for Critical Enablers (CEs) will fall in 26/27 to £72 million – a significant drop from £82 million in 25/26 and below the figure for 24/25 (£74million). There is no information on what the implications of this are for specific CEs such as socio-economics.

5.3 Our concern is that, while the NDA estate is expanding, albeit within existing communities at this time, funding for socio-economics will not increase to reflect this. Likewise financial support for engagement must be maintained and if possible enhanced. **A breakdown of funding for each CE should be provided – either within the Business Plan or directly to Nuleaf – to enable our members to understand the implications of the decrease in this budget line.**

5.4 We also note that 'Other central spend' increases dramatically in 26/27 but that this includes 'costs awaiting allocation'. We assume that a full clear allocation will be possible by the time the final Business Plan is published.

5.5 We are pleased to see the inclusion of a summary of expected funding from the Nuclear Liabilities Fund (NLF) for 2026/7 (page 18) and trust that this will be included in future Business Plans as additional AGR sites transition to NRS from EDF.

## 6. Our Strategic approach and themes

6.1 The **roadmap to mission delivery** (p.30) does not include any reference to the Geological Disposal Facility (GDF) in its milestones, although there are milestones relating to e.g. the disposal of all HLW. In contrast, waste destined for LLW disposal facilities or to permitted landfill is referred to in relation to the disposal route. **This seems inconsistent, particularly when the delivery of a GDF is referred to at a number of points in the document as critical to the overall mission.**

6.2 No strategic outcomes relate to Critical Enablers (CE). This will make it hard to assess progress around a broad range of objectives that underpin the NDA mission. **An explanation of why strategic outcomes have not been set for CEs would be welcome.**

6.3 The draft Business Plan states (p.31) that '*several of our critical enablers .. require group focus and attention.*' The CEs around Public and Stakeholder Engagement and Socio-economics are not included in the list of these. **Given the legal requirements around these enablers, as set out in the Energy Act (2004), it seems incongruous that these are not regarded as requiring group focus and attention.**



6.4 With regard to the Critical Enablers we would also note:

- CE10 states that the NDA's activities will 'where possible contribute to regional growth'. Local authorities, separately and through Combined/Mayoral Authorities, have a significant role to play in regional growth. **We therefore request a dialogue with NDA Group around the regional dimension of growth.**
- CE12 states that engagement should 'build a better understanding of our mission' and maintain the 'support, confidence and trust' of stakeholders. We believe that effective Public and Stakeholder Engagement should go beyond this and also be underpinned by partnership, co-creation and consent. Again, **given the changes in the NDA Group's engagement teams, we would welcome further discussion.**

6.5 Regarding the Case Studies, we are disappointed that none are focussed on socio-economics or engagement (the Trawsfynydd Case Study only addresses this indirectly). The Trawsfynydd Case Study **states that the project is 'set to begin autumn 2025' and needs to be updated to reflect that we are now in 2026.**

## 7. NDA Group key activities

### Sellafield

7.1 One of the highlights of 2026-29 is listed as a '*continued focus on supporting a low carbon future.*'

7.2 We assume that this refers to plans for Pioneer Park/Moorside. However, none of the Key Activities appear to be linked to this, and there is no explanation of what activities are planned or how this work is to be taken forward. It would be helpful to **explain what is meant here and to link to specific Key Activities and/or Critical Enablers.**

### Nuclear Restoration Services (NRS)

7.3 The Business Plan refers to the **Site Specific Strategies (SSS)** and the **Rolling Programme of Decommissioning (RPD)** strategy.

7.4 Greater clarity as to the scope and stage of development of the SSSs and plans for future engagement would be useful.

7.5 There appears to be a contradiction between various statements made. For example p.45 states that '*Site Specific Strategies have been developed*' but that



*'each site will also have long term options identified and decision points on both the decommissioning strategy and the end state...(with) ongoing engagement and consultation on our strategies for site decommissioning.'* The table on p.46 refers to continuing future *'development of site specific strategies'* while the expected date for the achievement of end states for individual sites are caveated with the statement that *"This is our best estimate of the earliest date to achieve milestones but is based on a number of dependences, assumptions, risks and exclusions and is subject to site specific strategy development and approval.'* Some of these statements imply that the SSS have been developed; others suggest that they are works in progress.

7.5 At a broader scale, our member local authorities are unclear as to the extent to which site strategies, plans, timelines and end states have changed to a significant degree following the agreement of a multi-year funding settlement for the NDA Group up to the end of the decade.

**7.6 Given all these uncertainties we would request that NRS engage Nuleaf and use our meetings to explain clearly the current framework for each site, the stage of development of SSSs and the RPD, and how the Spending Review has impacted on these.**

7.7 There is also a need for **a greater understanding of how the SSS interfaces with land and waste planning. We believe that the Strategies should include a requirement for sites to produce strategic spatial/masterplans that identify constraints, areas to meet decommissioning needs and opportunities.**

7.8 It is useful to have information for each site on the area that has been de-designated, and that which remains covered by the Nuclear Site License (NSL). However, **the information for Chapelcross appears to be wrong – it is the same as for Bradwell.**

7.9 It would also be helpful from a Local Planning Authority (LPA) perspective to **list the total land holding at each site, not just the area covered by the NSL. At sites such as Chapelcross, this larger land holding is important in facilitating the new economic activity.**

7.10 For all sites, the date by which all radioactive waste will be disposed is simply listed as 'TBD'. It would be helpful **to have an explanation as to why this is i.e. whether it relates to uncertainty around a GDF.**

7.12 Winfrith was initially expected to reach its End State by 2023 but this has now slipped to 2036. Elsewhere, it was announced in 2024 that Dounreay's decommissioning programme would not be completed by 2033 (originally 2023) but



would now run until the 2070s. Within the Business Plan there are now no dates provided at all for Dounreay, with it being noted that this is because the 'Lifetime Plan is currently under review.' **Such changes, coupled with the very limited information provided, make it hard for stakeholders to assess what success looks like in terms of delivery. It would be helpful to understand when the updated LTP for Dounreay is expected.**

7.13 We note the inclusion of the first two AGR sites due to transition to NRS in 2026, although again their end state dates have been reported as To Be Determined. The Hinkley Point B entry describes this as subject to the completion of the Site-Specific Decommissioning Plan but there is no explanation for Hunterston B.

### **Nuclear Waste Services (NWS)**

7.13 This section contains only very limited reference to the GDF programme. No reference to it is made in the text, although an artist's impression is provided. Only one of the Key Activities relates to the GDF.

7.14 This, coupled with the large reduction in the NWS budget (reduced from £216 million to £175 million in 26/27) and the departure of a number of staff, leads to inevitable uncertainty among local authorities and communities about the delivery of this critical infrastructure.

**7.15 In the lead up to the Secretary of State's response to the recommendation regarding the GDF siting process, and following that decision, it is vital that all stakeholders are fully engaged. Nuleaf will continue to work with NWS, Cumberland Council and other interested parties on this.**

### **NDA**

7.16 There is no explanation of the role of NDA 'core', unlike that provided for the operating companies. **This seems inconsistent.**

7.17 We cannot find any reference in the document to proposals for Near Surface Disposal (NSD) of some Intermediate Level Wastes (ILW). There has been a lot of discussion around NSD in recent years so we are surprised by this. **Information of the current status of plans for NSD would be welcome.**



**NDA Properties Ltd.**

7.18 This section refers to plans for environmental stewardship and support for carbon net zero objectives across the estate. Nuleaf is supportive of this and also the integration of sustainability into all work of the NDA Group.

7.19 Given the commitment to integration, **we would have expected to see more reference to how sustainability is being delivered across all pillars of the NDA.**

I hope these comments are helpful.

Yours faithfully,

**Philip Matthews**  
Executive Director