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Dear Sir or Madam,

South Gloucestershire Local Plan 2020: Consultation response

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

Our remit encompasses 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 the UK and Welsh Government, the Nuclear Decommissioning Authority (NDA) and regulators;
- to seek to influence policy and strategy for nuclear legacy management in the interests of affected communities; and
- to develop the capacity of our member authorities to engage with nuclear legacy management at a local level.

Our **Radioactive Waste Planning Group (RWPG)** is an expert forum for senior land-use and waste planning officers, supporting the development of



effective Local Plans and Minerals and Waste Plans. The RWPG has guided the development of Nuleaf's position on the planning aspects of nuclear decommissioning and waste management. More information on our approach is set out in **Briefing Paper 11: Approaches to Radioactive Waste Management in Local Plans**, published in 2020¹.

South Gloucestershire Council is an active member of Nuleaf, with Cllr. Matthew Riddle serving as our current Chair and with officer participation in our RWPG. However, this response has been prepared independently by Nuleaf, without consultation with our members in South Gloucestershire.

Response to consultation

Nuleaf advocates that all Local Plans and Minerals and Waste Plans, particularly those covering areas which include parts of the UK's nuclear infrastructure, should have policies on decommissioning and radioactive waste management. Their absence leaves local authorities and communities less able to influence proposals for the disposal, storage, management or transportation of radioactive materials within their area.

We therefore welcome the inclusion in this Phase 1 document of comprehensive policies on:

- Nuclear New Build
- Oldbury A Station- Decommissioning
- Radioactive Waste

We also note the references to nuclear elsewhere in the Plan, for example in relation to the policy on Nationally Significant Infrastructure Projects (NSIPs).

Together these policies address the current situation and potential new developments in the nuclear field that may impact on South Gloucestershire. They are clear, comprehensive, integrated and effective, placing all nuclear operations within a planning framework designed to deliver positive economic, social and environmental outcomes. We do not therefore propose any

¹ <https://www.nuleaf.org.uk/wp-content/uploads/2020/06/BP11-2020-Radwaste-and-local-plans.pdf>



substantive amendments but offer the following comments on the policies and the accompanying Sustainability Appraisal.

Nuclear New Build

The policy explains effectively the characteristics of the site under consideration and identifies the wider issues in terms of the economic, social, environmental and community impacts of any such development. The requirements for community benefits and mitigation measures are set out, as is the need to consider the impacts of construction and potential for infrastructure for spent fuel and radioactive waste stores. The changing dynamics within national nuclear policy and the potential for alternatives to a large scale Nuclear New Build (NNB) such as Small Modular Reactors (SMRs) and nuclear fusion are also noted. The policy is linked to other relevant policies contained within the Plan.

We support the commitment of the local authority to engage with the Nuclear Decommissioning Authority (NDA) and for integrated working between Oldbury A and any NNB. As a minor point we would note that the Policy erroneously refers to the Nuclear Decommissioning *Agency* rather than Authority and this should be corrected.

Oldbury-A Station – Decommissioning

The policy addresses all relevant issues including the need to maximise the opportunities for interim uses of the site and to protect employment and the quality of the local environment. It makes a welcome commitment to the development of a strategic masterplan for the site, in collaboration with the NDA, statutory bodies and the promoters of adjacent nuclear new build. The masterplan is described in detail in terms of its objectives and its aspiration to deliver benefits and a legacy for the local community and environment.

The proposed policy notes that the current NDA expectation is that land will be remediated and redesignated by 2103. This timetable may change, given current work by Magnox on re-evaluating the timescales for decommissioning at their UK sites. We would suggest that this is noted, and that the final policy reflects any changes in proposed timeline for Oldbury if they become clear before finalisation of this Plan.



Radioactive Waste

The proposed policy is linked to that on Decommissioning. It complements the proposals in the Decommissioning Policy for the development of an integrated approach to land use planning and for appropriate interim and end state uses.

The policy reflects the changing context for radioactive waste management, and in particular the potential for disposal of some Low-Level or Very Low-Level Waste (LLW or VLLW) on site. It notes the recent NDA Radioactive Waste Strategy and Environment Agency guidance and sets out the criteria against which the local authority will assess and proposals for the management, storage or disposal of waste at Oldbury. It also addresses off-site impacts and the approach to considering any proposals for the import of waste.

Finally, it addresses the issue of Community Benefits and the reasons why the establishment of an appropriately government Community Fund should be established. This is welcome.

In terms of the supporting text for the policy we would suggest that it may be worth referencing the following documents which are in development and likely to be published in consultation or final form in the coming months:

- The development by the UK Government (BEIS) of a new Decommissioning and Legacy Waste Management Policy, due for consultation in early 2021.
- The NDA's guiding Strategy 2021-26 (Strategy 4) due for publication in February 2021.
- The anticipated publication by the UK Government of Guidance for On-Site Disposal of Radioactive Waste from Nuclear Sites.

Sustainability Appraisal

In parallel to the consultation on the Local Plan, South Gloucestershire Council is also consulting on its Sustainability Appraisal of the Plan. We feel that at present the Appraisal does not provide an adequate assessment of the context in terms of nuclear issues.



In particular we would suggest that the review of relevant plan, policies and programmes (Appendix 3) references the following, all of which have been published recently or which are expected to be released in the next few months:

- UK Government Nuclear Sector Deal
- The upcoming UK Decommissioning and Legacy Waste Management Policy, due for consultation in late January 2021.
- Guidance for On-Site Disposal of Radioactive Waste from Nuclear Sites, expected to be published in 2021.
- NDA Strategy 4 and Radioactive Waste Strategy.

I hope these comments are helpful.

Your faithfully,

Phil Matthews
Executive Director