

By email to: Socio-Economic@nda.gov.uk

Date: 12th March 2020

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Dear Sir or Madam,

Draft NDA Local Economic and Social Impact Strategy 2020 to 2026

1. Introduction

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

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

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

- Local authorities bring a range of expertise in relation to economic development, planning, transportation, education and skills that is vital to the delivery of this Local Economic and Social Impact Strategy.
- Local planning authorities fulfil a regulatory function. Through NuLeAF our members have been able to provide expert advice on land use planning in relation to decommissioning and the management of NDA sites.

- Local authorities have a clear and significant role in the Geological Disposal Facility (GDF) siting process. Without their support the NDA and RWM will not be able to deliver this mission-critical facility.
- Councils are the democratic voice of communities and important stakeholders for NDA as required under the 2004 Energy Act.

NuLeAF is an independent body, guided by our members. We are funded by NDA, RWM and local authorities.

2. Socio-economics and the NDA

The social and economic impacts of the NDA's work are of central importance. However, to date the NDA has not had a coherent approach to this agenda and has thus been failing the communities that host the UK's nuclear legacy sites. Our view is supported by the Public Accounts Committee (PAC) which concluded in October 2018 that:

'We are not convinced that the NDA is achieving the wider economic benefits that would help justify the vast amounts of public investment¹.'

We welcome the production by NDA of this Local Economic and Social Impact Strategy and hope it is the basis for a significant overhaul of approach. The new Strategy must deliver the greatest possible legacy for nuclear communities, recognising the service they continue to provide on behalf of the country. It should reflect and be tailored to the needs of individual communities, all of which have distinct local economies within which the nuclear sector varies in terms of significance.

NuLeAF's **Policy Statement 5 (Nuclear Decommissioning and Socio-economics)**² and **Policy Statement 7 (Community Benefits)**³, both updated in recent months, set out our members views on the range of actions that the NDA Group should take to develop an integrated and effective package of support. We have submitted these Policy Statements along with this consultation response.

Below we set out our general and specific comments on the draft Strategy informed by detailed comment by our member local authorities. We have **highlighted in bold the issues that we wish to see addressed in the final paper** or in the wider work of the NDA.

¹ <https://publications.parliament.uk/pa/cm201719/cmselect/cmpubacc/1375/137505.htm>

² <http://www.nuleaf.org.uk/wp-content/uploads/2020/02/NuLeAF-Policy-Statement-7-Community-Benefits-final.pdf>

³ <http://www.nuleaf.org.uk/wp-content/uploads/2020/02/NuLeAF-Policy-Statement-7-Community-Benefits-final.pdf>

3. Principles for the new Strategy

The Socio-Economic Strategy should not sit in isolation from the delivery activities of NDA Group organisations. The Socio-Economic principles in the strategy should underpin activity across the NDA on accommodation, infrastructure, employment terms and conditions, procurement and transport, all of which can drive positive social and economic benefit. Furthermore, it is essential that this Strategy is properly integrated with Strategy 4 (S4) and the vision for the next five years that S4 sets out.

This integrated approach, known as **Total Societal Impact**⁴, is a more effective way to deliver social impact and greater financial return. By ensuring that the mission drives social impact, the NDA can achieve both its Energy Act obligations to communities and deliver greater value to the taxpayer by delivering the mission safer, sooner and cheaper.

The **approach in this Strategy to investment in transformational interventions is to be welcomed. It should be guided by the following principles:**

- **Proximity principle:** those community's nearest to NDA sites should receive the greatest levels of investment.
- **Proportionality principle:** levels of investment should be proportional to the level of impact in communities, taking into account social, environmental, economic and infrastructural impacts.
- **Positive Legacy:** the NDA's activities should leave a meaningful legacy for communities beyond simply the interventions required to enable delivery of the NDA's mission. All of NDA's activities should contribute to community wellbeing, be sustainable, protect and enhance the natural environment and enable our future economic strategy.
- **Sustainable Development Goals:** There should be alignment with these and in particular:
 1. *Sustainable Incomes:* Inspiring skills, education and personal development activities improve access to sustainable incomes.
 2. *Resilient Economies:* Resilient, inclusive and growing local economies creating and securing new opportunities.
 3. *Thriving Communities:* Social impact activities sustain and enhance community assets and address community needs.

The nature of the NDA's socio-economic support to communities is not only financial. Through partnerships and collaboration, the NDA can help to support a much wider programme of socio-economic interventions beyond the NDA's own strategy, hence creating a much broader impact.

⁴ <https://www.forbes.com/sites/bobeccles/2017/10/25/total-societal-impact-is-the-key-to-improving-total-shareholder-return/#281f90562113>

4. General Comments on the draft Strategy

The stated objective of this Strategy is to ensure that the NDA's '*decommissioning activities benefit local communities and provide a beneficial legacy once decommissioning work is completed.*'

It proposes that this is achieved through attracting inward investment to promote local economies that are less dependent on decommissioning; and supporting a healthy and competitive local supply chain. There is a recognition that the NDA must understand and work with the specific and varied local characteristics that exist around each NDA site. The Strategy also links the approach to the work of NDA around supply chains, property and people.

Page 3 states that the focus of the Strategy is on attracting sustainable investment into the communities near the NDA sites. We suggest **this upfront focus should include a high-level commitment to ensuring the socio-economic wellbeing of communities most local to the NDA sites.** This would cover issues mentioned later in the Strategy, including seeking to ensure that the skills base within local communities aligns with the skills needs of local employers, be they decommissioning skills and new businesses attracted by diversification of the economies of host areas.

The Strategy is right to recognise that, within a UK context, most of the NDA's sites are located in rural and relatively remote locations and that the complexity and forward plans for individual sites are also diverse in nature and in terms of timeframes for activity.

We support the analysis on the need to recognise the positive *and negative* impacts of the NDA's presence. These negative outcomes range from inflationary pressures on local housing to the effect the NDA has in some parts of the country on the availability of labour for other important skilled work.

We also welcome the commitments:

- To work more closely with local partners, including Local Enterprise Partnerships (LEPs) and local authorities.
- To taking a more active approach to land reuse to support wider local ambitions.
- To building strong linkages between NDA and wider interests on education and training.

However, at present there is a lack of information as to how exactly these aspirations and objectives are to be met. **We would like to see more explanation of:**

- **The process for taking this Strategy forward at a national and local level, including the means by which local authorities, LEPs and communities will be engaged over the short, medium and long term.**
- **The ways in which the NDA intends to fully analyse and address any negative impacts of their presence within a community.**

We suggest **a commitment should be given to engaging with local authorities and other relevant organisations/ groups at an early stage in the implementation of the Strategy**, to ensure that NDA actions dovetail with local priorities and policies in host communities, and that they complement and do not duplicate other actions locally.

We also believe that it is important to measure the success of interventions, so that this can inform future strategies, plans and actions. Enhanced reporting of outputs, outcomes and impacts is required, enabling an understanding of how the NDA is working across all areas from investment to the support of local supply chains. The Strategy notes (p29) that NDA strives for transparency and has made efforts to provide more data via gov.uk. and the information available is certainly better than that previous provided. **We propose that NDA work with NuLeAF, local authorities and other stakeholders to develop a suitable suite of indicators, targets and data needs that should be reported on annually. Thought also needs to be given to how the public accessibility of reporting can be further increased.**

Finally, the Strategy would benefit from a greater use of graphics and other means of enhancing accessibility and readability. **We would suggest graphics should be used to illustrate how this new Strategy will sit within the wider strategy landscape and how it will operate at a local level, showing the linkages to other organisations and related work. A case study illustrating the impacts this new approach might have on a community would also be helpful.**

5. Site by Site Action Plans

The setting out of site by site action plans is welcome. NuLeAF and our members have sought to inform these plans through the regional and local engagement we have undertaken with NDA in relation to this Strategy.

We support:

- The commissioning of research. **We would request more information on what research has or will be undertaken, how this will engage with local authorities going forward and how it is intended to use this to influence and guide the NDA's approach.**
- The commitment to larger socio-economic initiatives and to link these to NDA strategies, local authority strategies or BEIS policies.
- The key themes (p8) **but would note that there are only 5 themes listed even though the Strategy states there are six.**

Furthermore, we welcome the commitment to build capacity and capability to make business cases for larger, more transformational projects (p9) **but would ask that more information on how NDA intends to achieve this be made available.**

The Strategy (p8) notes that interventions at sites will be assessed using the decision-making framework set out in Section 3. However, **clarification is required as to whether this decision-making framework applies simply to grants or to wider interventions. The document is not clear on this at present. As we note in Section 5 (below) the information on the exact nature of this framework is limited and more is needed.**

We also believe the Strategy should **explain how NDA intends to engage with EDF and new nuclear providers, and how this Strategy might be adapted to future developments such as the potential for NDA to have a role in decommissioning the AGR fleet.**

Our member local authorities have offered the following comments on the proposals for individual sites or areas of the country and may also reflect these in direct responses to the consultation. In each case we have identified which local authority is offering the comments. **We hope these detailed and constructive comments are taken on board with NDA in finalising the site by site action plans and would propose that the NDA engages directly with the individual local authorities to discuss the comments provided.**

<p>West Cumbria</p>	<p>1. Cumbria County Council</p> <p>The Council welcomes the new approach to socio-economic funding for the period 2020-2026 and notes that the NDA will be working more closely with Sellafield Limited in managing the funding in West Cumbria to further maximise economic impact. However, the local authority would like to see more detail on how this new approach will engage with wider partners and not just the 'usual suspects' in order to improve transparency and decision making for socio-economic investment.</p> <p>The council notes that there are significant economic opportunities to be realised from the nuclear expertise in West Cumbria as identified in the Local Industrial Strategy. However, more needs to be done to grow the supply chain and the R&D offer in order achieve agglomeration and clustering benefits.</p> <p>Despite the above average household incomes and wealth creation in the area, there remain persistent pockets of deprivation with some neighbourhoods in West Cumbria being amongst the most deprived in the UK. More needs to be done through the socio-economic programmes that tackle this directly.</p> <p>The programme of transformation at Sellafield is likely to see a decrease in employment which could potentially have a significant impact on local communities unless appropriately mitigated. For the NDA to be successful in achieving its mission of ensuring that communities are supported socially and economically there is a need for improved collaborative working between NDA, Sellafield, the Cumbria LEP and the Local Authorities.</p>
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Areas of Cumbria are impacted greatly by the nuclear sector and while concentrated in the West Coast, especially Copeland, many firms in the nuclear supply chain are located elsewhere in the county. It is therefore important the NDA's future plans build on the potential opportunities for economic growth and diversification to support the local economy.

Priorities for investment should include:

- **Supply chain development and support across sectors**
- **Improved research and development facilities to increase innovation**
- **Support for local businesses which have significant potential for export growth**

In developing NDA's future socio-economic plans, there is the opportunity to achieve good alignment with the LEP's Local Industrial Strategy. The Cumbria LEP provides the strategic lead on skills and business needs. The emerging Local Industrial Strategy is focused on enabling inclusive economic growth in Cumbria and on increasing productivity – and as such is a good fit with the NDA objectives relating to the wider economy.

Infrastructure

The County Council has been working closely with Cumbria LEP to make the case for improvements to infrastructure in West Cumbria to support the nuclear sector. Improvements to connectivity will deliver socio-economic benefits for West Cumbria and we would hope that NDA and Sellafield will continue to work with the Council and the LEP to make the case for improvements to infrastructure as part of NDA's on-going socio-economic activity.

A joined-up approach (by the nuclear industry, the County Council and government) **is essential to ensuring that Cumbria's infrastructure can meet the demands of the nuclear industry.** For example, working with DfT to progress scheme development work for improvements to the capacity and resilience of the Cumbrian Coastal Railway. On-going support from NDA would be welcomed. Similarly, working with Highways England to make the case for the Whitehaven Relief Road to address the network reliability and pinch-points problems in Whitehaven.

It is considered that the NDA is strongly positioned to assist with the continued development of proposals and provision of critical delivery funding for the Cumbrian Coast Line. Over the years, DRS has successfully diversified operations, and reflecting the importance of the Cumbrian Coast Line, an increasingly proactive role would align with the increased emphasis DfT has given to third parties and beneficiaries in the funding and delivery of rail infrastructure to support their operations or strategic interests.

Strategic objectives

It would be beneficial if **NDA and Sellafield Limited took some time to work with partners in West Cumbria to refine a strategy for West Cumbria and to identify the priority areas for investment, including identification of the high impact and transformational**

projects. This would create a framework within which project and programme business cases could be developed and brought forward. **A clearer set of outcomes than currently presented in the consultation document needs to be developed.** Local partners would be willing to work on this with NDA and Sellafield Limited.

Governance

With £11.5m pa over 6 years of investment in West Cumbria there is potential to make a significant difference if the funding is well targeted at the right projects in the right areas. This includes £10m pa of Sellafield Limited funding and £1.5m pa of Copeland Community Fund (CCF). This funding could either be absorbed into a single programme for West Cumbria or the CCF management could be contracted out as a separate programme to a third party to manage on behalf of the Accountable Body. In order to ensure delivery of the funding within the 6 year period, it will be important to have the right governance in place. **It is not clear from the consultation document how this will work and further detail on this would be welcomed.**

There is learning that can be taken from the LEP Investment Panel and the associated programme management and governance in terms of providing assurances on value for money and transparency of decision making.

2. Copeland Borough Council

The Council expects that the NDA and Sellafield Ltd will engage closely with the local authority and partners to maximise UK government's investment at Sellafield by extraction of social and economic value from the site, hence also meeting the NDA's obligations under the Energy Act 2004. This includes ensuring that UK Government continues to fund completion of the site's mission beyond the High Hazard and Risk Reduction programme and enabling new missions on the site, where this is appropriate and aligns with the community's aspirations.

Over time, officers and elected representatives of Copeland Borough Council have developed a level of technical and contextual knowledge and understanding of the nuclear sector and particularly of the Sellafield site. In light of this, it is expected that in future the NDA and its delivery organisations will afford Copeland Borough Council the same level of trust, transparency and respect that they would any other competent regulator, when considering future plans for activities in the Borough.

Accommodation Strategy

The Council supports the NDA's commitment to relocate 2,000 staff into local town centre accommodation. The Sellafield site is increasingly congested, and non-essential staff should be relocated to make space on the site to support the mission but also to help local businesses grow and increase the footfall within the towns. When projects for town-centre relocation are being considered, the Council **would request that they are fully engaged in the planning of such decisions in order to facilitate such relocations.**

	<p>Copeland Community Fund The Copeland Community Fund delivers significant benefit to communities around the Low-Level Waste Repository site and should be protected under the new Socio-Economic Strategy.</p> <p>Beneficial Land Reuse CBC believe that the NDA’s obligation under the Energy Act go beyond simply minimising the impact of its activities on the communities adjacent to nuclear licensed sites. The decommissioning mission at Sellafield is the economic engine of Copeland community. This will not be the case in the future. The single greatest legacy that the NDA could create for this place would be to help to facilitate the future economy, post-decommissioning. Therefore, CBC believes that it is incumbent upon the NDA to facilitate the beneficial future use/reuse of NDA-owned land and nuclear sites to enable the Council’s economic strategy.</p> <p>The NDA should divest of land outside of existing nuclear site license boundaries for which it has no identified use, where this land could enable or support new missions in line with the nation’s and community’s interest (e.g. advanced nuclear technologies).</p>
<p>North West Wales</p>	<p>Isle of Anglesey County Council (IACC)</p> <p>The Council understands the importance of a regional NDA view of North West Wales. However, due to the differing timescales, pressures and issues it is critical that each site is subject to a separate action plan. Therefore, the Council proposes that the final Strategy sets out a separate Action Plan for Wylfa.</p> <p>The IACC has a positive long-standing relationship with the NDA. NDA funding support has been a catalyst to enable development of socio-economic projects that have added considerable value to Anglesey.</p> <p>Wylfa Power Station has been a valued and important contributor to the local and regional economy. The NDA’s Economic Impact Assessment of Magnox Sites report in 2018 identifies Wylfa as the site upon which decommissioning will have the greatest adverse local impact in the UK. With uncertainty surrounding the overall decommissioning programme (for all sites), it is essential that the site decommissioning plan is shared at the earliest opportunity, to enable alignment with the North Wales Growth Vision, the Energy Island Programme, any progress being made in terms of Wylfa Newydd and the needs of North Anglesey, to deliver meaningful new employment opportunities. The criticality of the draft Local Economic and Social Impact Strategy (2020-2026) for North Anglesey cannot be overestimated.</p> <p>The principle of Anchor Projects is accepted and the NDA’s commitment to create capacity and capability to develop the business cases for ‘Anchor Projects’ is welcome. IACC is eager to better understand how this support can be accessed.</p> <p>The draft Local Economic and Social Impact Strategy recognises the challenge of defining the economic plan for Wylfa due to the uncertainty</p>

	<p>surrounding the Wylfa Newydd suspension. The IACC remain committed to working with both the NDA and other key stakeholders to define the 'Anchor Projects' and better understand the future of Wylfa Newydd and how North Anglesey can contribute to UK and WG Net Zero targets.</p> <p>The Council remains fully committed to the Wylfa Newydd Project. It remains an integral part of the Energy Island vision to put Anglesey at the forefront of the low carbon energy sector that has the potential for significant employment opportunities and transformational economic benefits in the region. Despite the suspension, it is essential that the economic benefits of Wylfa Newydd are recognised within the final version of the Local Economic and Social Impact Strategy.</p> <p>The IACC has developed and adopted the 'Proximity Principle'. It recognises that those areas, communities and people who are located the closest to a major development, are impacted the most (positively and negatively). The intention of the Proximity Principle is to ensure there is alignment between the type and level of impacts experienced, and the type and amount of activity, intervention, and mitigation required. The County Council believes that this Principle should be adopted in relation to any intervention relating to the decommissioning of Wylfa. In line with the Proximity Principle the IACC believe that the spatial area of the North Anglesey should provide the footprint for future local NDA socio-economic investment.</p> <p>Monitoring and managing the gap between the commencement of Wylfa Newydd and decommissioning of both Wylfa and Trawsfynydd will be crucial, so as not to lose the skills that have developed in the sector. Whilst Wylfa Newydd remains in suspended state, there is an increasing risk that without socio-economic intervention these specialist skills could be lost as a result of outmigration.</p> <p>The lack of entry-level employment opportunities in North Anglesey (for school leavers, Post-College or University) remains a major concern for the IACC. Whilst the draft Strategy focuses on Inward Investment, it is essential that investment in education and skills, in line with existing activities being progressed through the North Wales Regional Skills Partnership and the NDA supported STEM Gogledd programme, is recognised to enable the local community to capitalise on opportunities that will arise from any future inward investment.</p>
<p>Harwell</p>	<p>Vale of the White Horse District Council</p> <p>In principle the local authority would agree with the strategy for the Harwell site outlined within the NDA's draft strategy. Highlighted in the Vale Council's Local Plan 2031 is the importance of the campus providing a net of 3500 jobs by 2031 as ongoing decommissioning of the licensed site takes place.</p> <p>The Vale Council's Business and Innovation Strategy 2016 - 2020 (BIS) outlines themes including the need to support businesses with attracting and retaining skilled staff, particularly graduates, and the need to address skills gaps in key areas. Other challenges outlined by the Vale's BIS report</p>

	<p>include the lack of available, good quality workspace in the area. This could be positively affected by the freeing up of land at the decommissioned site allowing further development at Harwell Campus.</p> <p>There is a strong business support system in place at Harwell Campus from a variety of organisations including South and Vale Business Support (SVBS), the Science and Technology Facilities Council (STFC), Oxfordshire Local Enterprise Partnership (OxLEP) and the campus management itself. This means the area is well placed to mitigate the impact of decommissioning. However, to maximise the potential positive impact, it is advised that the NDA continues to engage with STFC and Harwell Campus management, particularly the energy cluster team, to investigate pathways to support businesses in attracting and retaining skilled staff.</p> <p>It may be possible to broaden the impact of the strategy significantly by involving a wider group of local stakeholders; however, this requires further information than is currently available within the NDA’s draft. Information about how businesses, community groups and other interested parties would be able to engage with or take advantage of the strategy would also be welcome at this stage.</p>
<p>South East England – Bradwell and Sizewell</p>	<p>Suffolk County Council (SCC)</p> <p>While the Strategy is welcome there are other socio-economic facets the Action Plan for South East England could address. We would like to see reference to County Council’s commitments to inclusive growth. This includes educational attainment, skills and productivity, but also:</p> <ul style="list-style-type: none"> • Improvement to health and quality of life – including the issues arising from Suffolk’s ageing population. • Protection of natural capital and landscape - notable due to Sizewell’s presence in an AONB and the important part natural capital and landscape play in the tourism economy of the area. • High quality infrastructure, including transport and digital infrastructure. <p>SCC would welcome it if the strategy highlighted some of the priorities in Suffolk’s Framework for Inclusive Growth and consider how it could contribute to them, in addition to skills and young people, within this strategy. There may be other relevant local plans and strategies that the Socio-economic Strategy could positively contribute to towards and we would encourage the NDA to consider these (see here⁵).</p> <p>The Strategy refers to the Norfolk Local Industrial Strategy. We would appreciate if this was changed to the Norfolk and Suffolk Local Industrial Strategy.</p>

⁵ <https://www.suffolk.gov.uk/council-and-democracy/our-aims-and-transformation-programmes/the-councils-plans-and-priorities/>

South West England – Berkeley, Oldbury and Hinkley Point A

Gloucestershire County Council (GCC) and South Gloucestershire Council (SGC)

The socio-economic benefits derived from the investment made in the Gloucestershire Science and Technology Park by Stroud and South Gloucestershire College at the former Berkley nuclear laboratories are acknowledged in the draft NDA Socio-Economic Impact Strategy.

However, the Councils understood from the south west engagement event some months ago that the intended approach was for the Strategy to address local issues relevant to the immediate site/community to those sites. We are concerned that the section on South West England focusses almost entirely on strategy and actions related to Hinkley Point. While there is engagement between the West of England and the Heart of the South West LEPs, the sites at Oldbury and Berkeley are located within the West of England Combined Authority and LEP area and the Gloucestershire GFirst LEP areas respectively. The administrative boundary of Gloucestershire County is coterminous with that of the GFirst Local Enterprise Partnership area. These are separate entities with their own distinct circumstances, have their own Local Industrial Strategies and are subject to their own governance.

We therefore question the NDA Strategy suggestion that 'The NDA's South West sites are already integrated into the wider EDF-led work at Hinkley C.' Geographically, Oldbury is within South Gloucestershire and Berkeley is within the County of Gloucestershire and very much on the periphery of the 90 minute commuting zone for Hinkley C. The host communities around the Oldbury and Berkeley sites are therefore far from the Hinkley Site. Integration into the wider EdF-led work at Hinkley C is likely to be limited, and the relevance of the Hinkley related priorities listed to Oldbury's and Berkeley's host communities seems questionable.

We request that the section on the South West of England relating to Berkeley and Oldbury needs to be differentiated and considered separately from the Hinkley section. Specific actions should be identified and drafted that are relevant to the priorities for and community profile of those respective geographic area.

We refer the NDA to the West of England (WoE) Combined Authority (WECA) web site⁶, that includes the July 2019 Local Industrial Strategy⁷, and also the linked West of England (WoE) Employability and Skills Strategy⁸. There is also the WoE LEP web site⁹.

It is also suggested that since Oldbury not only hosts the decommissioning power station, but also the Magnox Technical Centre,

⁶ West of England Combined Authority <https://www.westofengland-ca.gov.uk/>

⁷ WECA & WoE LEP Local Industrial Strategy July 2019 <https://www.westofengland-ca.gov.uk/ourstrategy/>

⁸ West of England Employability and Skill Strategy <https://www.westofengland-ca.gov.uk/skills/>

⁹ West of England Local Enterprise Partnership <https://www.westofengland-ca.gov.uk/lep/>

with its quality employment opportunities, the NDA's socio economic initiatives have the potential to benefit not only local communities but also the skills needs of Magnox.

Similarly, we refer the NDA to the Gfirst LEP website, with particular reference to the Local Industrial Strategy for Gloucestershire¹⁰, which was prepared and submitted to Government, and is awaiting approval. The Strategy identifies Gloucestershire's strengths, opportunities and challenges, and also aligns with the Government's national Industrial Strategy, which focuses on five 'Foundations' for productivity, and four 'Grand challenges', one of which is clean growth. The Berkeley project was also identified as an important element and contributor of the current Gloucestershire Strategic Economic Plan¹¹, which outlined the county's ambitious growth plans.

In terms of specific actions, **it would be helpful to include examples that are relevant to the particular circumstance of host communities around Oldbury and Berkeley, for example:**

- STEM and seeking to inspire and raise the aspirations of young people in relation to career choices and levels of achievement. This could also include Family learning and development activities, working with schools to raise the ambition for the earliest age and promotion of and commitment to STEM.
- Apprenticeships related to decommissioning related technologies such as robotics, energy generation and emerging technologies.
- An inclusive approach to community learning, including up-skilling and re-training in the adult population, especially in the more rural areas (Berkeley and Oldbury are set within a relatively rural context). This can support community development and resilience as well as individual well-being and can be a first step for someone back to work or changing career.

We note the action relating to tidal power, but question, in view of the vulnerability of adjacent areas and communities to flooding and the international designations on the Estuary, whether any commitment in respect of tidal power should be qualified by reference to the need to address these issues.

Stroud and South Gloucestershire College is making the ambitious move to take on the non-licensed site and is making significant investment in developing an innovative science park, which has delivered many of the socio-economic benefits on behalf of the NDA. To date they have attracted some high-profile tenants and generated some exciting future research and development activities including renewable energy, battery storage and other emerging innovative technologies. **The Site Stakeholder Group and local community would like to see the adjacent NLS decommissioned as soon as possible to support the**

¹⁰ <https://www.gfirstlep.com/industrial-strategy/>

¹¹ <https://www.gfirstlep.com/about-us/our-vision/strategic-economic-plan/>

	<p>continued growth of the current science park to benefit the local economy, education provision and local community.</p> <p>SGC and GCC would welcome engagement with NDA to ensure that the section on Oldbury and Berkeley sets out actions that better reflect the needs of the host communities, and to discuss potential actions.</p>
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6. Individual projects

This section notes the need to demonstrate Economy, Effectiveness and Efficiency and defines these terms. It also establishes 4 principles and themes, namely Resilient Economies, Thriving Communities, Sustainable Incomes and Sustainable Growth.

These themes are to be supported and cover most of the desired outcomes of NDA project funding. The Strategy also states that a framework for decisions on funding has been developed based on the NAO criteria for value for money. **There is no further information on this, and we would request that NDA publish and consult on this framework.**

The Strategy also mentioned the '*creation of a single committee to oversee all significant expenditure*' (p25) but does not provide further information on the membership, structure or means of operation of this. **NDA should provide this.**

The publication of the yearly socio-economic budgets for individual sites/components on the NDA estate is welcome, as is the commitment to increase the overall budget to just under £16,000,000 per annum. What is less clear is how any underspend will be managed i.e. will it be carried over into the next years' budget? **We would ask that NDA clarify this.**

Section 3 also sets out an objective to '*attract in significantly higher levels of funding through joint working with local and national government.*' (p25). **We support this but believe that an explanation is required as to how this will be achieved and how success will be measured and reported on.**

We believe that the section on 'Thriving Communities' (p27) **should also include reference to diversifying and enhancing local skills base** so that local people can benefit from high quality job opportunities resulting from the decommissioning of NDA sites and the diversification of local economies in areas local to NDA sites.

Finally, a central objective for NuLeAF is that the NDA commits to the provision of community benefits for nuclear decommissioning and radioactive waste management in the UK. This should recognise the impacts on communities of hosting (a) nuclear decommissioning sites (b) long term nuclear waste stores (c) radioactive waste management and disposal infrastructure such as landfill sites and (d) radioactive waste left in-situ or on-site. The approach taken should go beyond

what is proposed in Section 3 in terms of grant funding. **In line with the proposals set out in NuLeAF Policy Statement 7¹² we believe that NDA should establish a formal system of community benefits. We would welcome further dialogue with NDA on this issue.**

I hope these comments are helpful.

Yours faithfully,

A handwritten signature in black ink that reads "Philip Matthews". The signature is written in a cursive style with a large initial 'P'.

Philip Matthews
Executive Director
07949 209126

¹² <http://www.nuleaf.org.uk/wp-content/uploads/2020/02/NuLeAF-Policy-Statement-7-Community-Benefits-final.pdf>