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Executive Director

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Dear Sir/Madam

**West Berkshire Minerals and Waste Local Plan:
Consultation response from Nuleaf**

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. West Berkshire Council is a member of Nuleaf.

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 Welsh and UK Government, the Nuclear Decommissioning Authority (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.



Our Radioactive Waste Planning Group is an expert forum for senior land-use and waste planning officers, which aims to support the development of Local Plans and Minerals and Waste Plans.

Response to consultation

Nuleaf advocates that all Local Plans and Minerals and Waste Plans, particularly those covering areas which include elements of the UK's nuclear infrastructure, should have policies on decommissioning and radioactive waste management. More information on our suggested approach is set out in our **Briefing Paper 11: Approaches to Radioactive Waste Management in Local Plans**, published in 2020 (<https://www.nuleaf.org.uk/wp-content/uploads/2020/06/BP11-2020-Radwaste-and-local-plans.pdf>).

The absence of clear policies 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 of Policy 13 on **Radioactive Waste Treatment and Storage at AWE**. This gives a clear statement of the local authority position in relation to the Aldermaston and Burghfield sites. It covers all relevant categories of radioactive waste and requires that a need is proven before the development of any new waste facilities is permitted. It also acknowledges that radioactive waste may arise, in small quantities, from other operations in West Berkshire such as health facilities.

In terms of the supporting text for the policy we would suggest the following key elements of the wider policy context for radioactive and nuclear waste management are referenced:

- The development by the UK Government (BEIS) of a new Decommissioning and Legacy Waste Management Policy, due for consultation in early 2021.
- The Nuclear Decommissioning Authority's (NDA) Radioactive Waste Strategy, published in 2019. This sets out a framework for an integrated approach to all nuclear wastes. It defines an optimal approach to waste management and disposal based not just on



classification (e.g. LLW, ILW) but also the risk that individual waste streams present.

- The siting process for a Geological Disposal Facility (GDF), launched in 2018. This is seeking to identify a site for a deep repository for the UK's Higher Activity Radioactive Waste, including from the MOD.

Comments on Duty to Co-operate

Policy 13 does not refer to the Duty to Co-operate. It notes that much of the waste arising at AWE sites will be disposed of at the Low-Level Waste Repository (LLWR) in Cumbria. In reality, over 90% of LLW is now diverted from the LLWR to other disposal and management routes, including for landfill disposal, super-compaction, incineration and material recovery. The facilities that manage these processes are across the UK and also overseas. It is important therefore that the full implications of this are considered in relation to the Duty to Co-operate with other local authorities.

Your faithfully,

Phil Matthews
Executive Director