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Dear Sir / Madam

SOUTH GLOUCESTERSHIRE POLICIES, SITES AND PLACES PLAN, PROPOSED SUBMISSION PLAN, SUGGESTED MODIFICATIONS CONSULTATION
Representation on behalf of the NDA and Magnox Limited

We are writing to you on behalf of the Nuclear Decommissioning Authority (the NDA) and Magnox Limited, in respect of the current consultation on the suggested modifications to the Proposed Submission version of the Policies, Sites and Places (PSP) Plan. GVA is the appointed property advisors for the NDA and Magnox Limited, and provides planning advice across the NDA's UK wide estate.

We previously made representations on behalf of the NDA and Magnox to the consultation on the Proposed Submission version of the PSP Plan on 8 September 2016. Our comments have been assigned the representor ID '263/1'.

Representation Made

We note that that the Council has published their response to the representations made to the Proposed Submission Plan consultation along with their suggested modifications to the Plan. These representations are made in respect of the Council's response and accompanying suggested modification (reference 'SM57'). The 'Suggested Modifications Consultation Comments Form' is attached to this letter.

For ease of reference, the NDA and Magnox's previous representations sought the inclusion of a new site specific policy relating to Oldbury Nuclear Power station as follows:

"Policy PSPXX Oldbury Nuclear Power Station

In accordance with Core Strategy Policies CS36 and CS37, the existing site at Oldbury will be retained for operations and uses associated with the decommissioning of the nuclear power station, related employment uses and, where feasible, be integrated with the proposed new nuclear build at Oldbury."

It was also suggested that the following paragraph be inserted after the new policy to provide additional clarity:

“Oldbury is subject to decommissioning, a long process which will extend beyond the plan period. Certain proposals for new development (associated with decommissioning) will be required at Oldbury. In order to minimise impact and maximise re use of the existing facilities and materials, opportunities have been taken where feasible to integrate the requirements of a new build power station at Oldbury with the decommissioning of the existing power station.”

We note from the Council's response to GVA's representations that it considers that the adopted Core Strategy (adopted December 2013), together with the Development Management policies contained within the emerging PSP Plan include adequate policy provision for the decommissioning of the existing power station. As such, the Council does not consider it necessary for the site to be allocated or safeguarded for decommissioning purposes. We note, however, that the Council does propose to include a map within the PSP Plan showing the extent of the existing Oldbury nuclear site as well as that of the nominated Oldbury New Nuclear Build (NNB) site.

Whilst the proposed plan is a helpful addition to the PSP Plan, the NDA and Magnox maintain their view that that a site specific policy relating to the existing Oldbury site is required. Such a policy would distinguish between the existing and proposed nuclear power stations, and provide clarity between the different activities and operations on the two sites. This would ensure the plan is positively prepared with respect to Oldbury. The policy could also ensure that the PSP Plan recognizes the significance of NDA national strategy (see below) to the decommissioning process.

The approach to having separate policies for existing and proposed new nuclear power stations has been taken by other local authorities in their development plans. Example policies are contained within the Suffolk Coastal District Local Plan Core Strategy & Development Management Policies Document (adopted July 2013), West Somerset Local Plan to 2032 (adopted November 2016), Copeland Local Plan 2013 – 2028 Core Strategy and Development Management Policies Document (adopted December 2013) and the emerging Anglesey & Gwynedd Joint Local Development Plan.

The approach suggested is therefore consistent with development plans elsewhere in the UK and the inclusion of a site specific policy within the emerging PSP Plan would provide a suitable opportunity to make reference to the national strategies which govern the decommissioning and remediation process. This would ensure the plan is consistent with national policy.

It is noted that the Council considers that the adopted Core Strategy contains the relevant policies covering decommissioning at the existing Oldbury site is noted. However, the NDA and Magnox wish to highlight that the Core Strategy does not include reference to current national strategies which govern the decommissioning and remediation process – strategies which are subject to regular review and consultation. The NDA's national strategies for the management of radioactive waste are recognized as national policy in the planning arena in a number of adopted and emerging development plan documents including the Somerset Waste Core Strategy. The NDA and Magnox have made a number of representations to development plans throughout the UK to ensure that the policy provisions

relating to their sites¹ make reference to the need to comply with the aforementioned national strategies for decommissioning and radioactive waste management (including NDA Strategies). Therefore, the NDA and Magnox requests that, for consistency, the relevant development plan documents for South Gloucestershire have regard to these national strategies as they represent national policy in the planning arena.

The changes sought by the NDA and Magnox will ensure the plan is positively prepared and consistent with national policy, and therefore be regarded as sound.

Conclusion

This representation has been made by GVA on behalf of the NDA and Magnox Limited in response to the current consultation on the suggested modifications to the Proposed Submission version of the Policies, Sites and Places (PSP) Plan.

In summary, whilst the inclusion of a map within the PSP Plan showing the extent of the existing Oldbury nuclear site as well as that of the nominated Oldbury NNB is welcomed, the NDA and Magnox maintain their view that a site specific policy relating to the existing Oldbury site should be included within the emerging PSP Plan in order to support existing and potential future development at the site, which includes development associated with decommissioning. The inclusion of a site specific policy within the emerging PSP Plan would also provide a suitable opportunity to make reference to the relevant national strategies which govern the decommissioning and remediation process, thus ensuring compliance with such strategies. .

If you require anything further in respect of this representation, then please contact me on [REDACTED] or at [REDACTED]

Yours faithfully



Ben Lewis MRTPI
Director in Planning, Development & Regeneration
For and on behalf of GVA Grimley Limited

cc. [REDACTED] NDA
[REDACTED] Magnox Limited

¹ Example policies can be found in the adopted Kent Minerals and Waste Local Plan, the adopted Somerset Waste Core Strategy, the adopted Cumbria Minerals and Waste Development Framework Core Strategy and Generic Development Control Policies Development Plan Documents, and in the emerging plans for Cumbria, Essex and Southend-on-Sea, Oxfordshire and Bournemouth, Dorset and Poole Councils.